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400 N. Capitol Street NW, Suite 475, Washington, D.C. 20001

October 16, 2025

The Honorable Pam Bondi
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530

Dear Attorney General Bondi,

On behalf of the National Shooting Sports Foundation (NSSF), the trade association for the firearm and ammunition industry, I write to respectfully urge the Department of Justice to both reopen the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Firearms and Explosives Import Branch (FEIB) for commercial import processing, and to resume the processing of Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Form 2 notifications of manufacture/importation, as well as Form 3 and Form 4 applications for the lawful transfer of items regulated under the National Firearms Act (NFA), including suppressors (commonly referred to as silencers), short-barreled rifles, and short-barreled shotguns, during the current government shutdown.

While we understand the operational challenges that arise during a lapse in federal funding, the complete cessation of commercial NFA item processing—despite the continued operation of the FBI's National Instant Criminal Background Check System (NICS)—represents an unnecessary and disproportionate burden on law-abiding Americans. More importantly, it infringes upon their constitutionally protected Second Amendment rights.

FBI NICS, which continues to function and process background checks for standard firearms transactions, is the same system used to vet applicants for NFA items via Form 4. Resuming Form 4 processing would not place additional strain on background check infrastructure, nor require additional staffing by FBI.

Additionally, continued processing of Form 2 notifications from manufacturers and importers is critical to ensure that the National Firearms Registration and Transfer Record (NFRTR) remains up to date, to allow for the transfer of newly manufactured or imported NFA items throughout any shutdown period. Coordinately, continued processing of Form 3 applications for transfers between licensees is critical to ensure that product remains available for customers who may wish to exercise their Second Amendment rights by purchasing an NFA item at their local firearms retailer.

As you are aware, suppressors are legal to own in 42 states, are currently in use by more than **3 million law-abiding citizens**, and are only growing in popularity. These devices serve critical safety functions by reducing the risk of hearing damage for hunters, recreational shooters, and range personnel. The lawful manufacture, acquisition, and transfer of such items (and other NFA items) should not be arbitrarily halted, especially when the underlying security checks necessary for their transfer continue to be fully operational.

NSSF has worked extensively with ATF over many years toward reducing NFA form processing times and is thankful for the efficiencies which ATF has implemented to drive down wait times for the processing of NFA Form 4s from over 250 days to just 35 days for paper applications, and from over 100 days to a mere 10 for electronic submissions. However, NSSF is concerned that halting the processing of commercial NFA forms during this government shutdown period will hamper these substantial gains, as ATF staff will face a tremendous backlog of not only Form 4s, but also Form 2s and 3s whenever the government reopens—leading to yet further unnecessary and unconstitutional delays in the exercise of these rights. Such backlog is likely to be further exacerbated by the expected surge in transfer applications for NFA items in the new year – once the reduction in the NFA transfer tax to \$0 takes effect.

The cessation of commercial firearms and ammunition import permit processing similarly denies Americans the ability to exercise their Second Amendment rights through the acquisition of imported articles, a key source of both firearms and ammunition for American consumers. In 2024 alone, there were over 5.5 million firearms imported into the United States, as well as over 3.9 billion rounds of ammunition. Halting this critical operation also hampers the ability of domestic firearms and ammunition manufacturers to maintain production, as many rely on imported components and unfinished parts as part of their manufacturing processes, the import of which must be approved by ATF. As with the processing of NFA forms, the continued shutdown of commercial importing activity will create an approval backlog that will likely further delay import approvals beyond the reopening of the government.

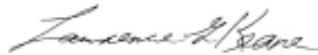
A right delayed is a right denied. Although NSSF understands that the government faces countless difficult decisions during a shutdown regarding which functions are critical and must remain operational, a key consideration in making such decisions must be whether suspending an operation negatively affects or prevents the exercise of the fundamental rights of American citizens. The suspension of commercial import permits and NFA form processing does just that, by denying Americans the ability to obtain products constitutionally protected by the Second Amendment for the duration of the ongoing government shutdown.

Accordingly, we urge you to direct the ATF to immediately resume processing ATF Form 2 notifications, and Form 3 and 4 applications, and to resume processing of commercial firearms and ammunition imports. This action would demonstrate the Department of

Justice's commitment to upholding the Constitution, ensuring the fair and equitable treatment of firearms owners, and maintaining access to safety-enhancing devices already widely accepted and responsibly used throughout the country.

Thank you for your attention to this important matter. The NSSF and our members stand ready to support your office in any way necessary to facilitate the prompt resolution of this issue.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence G. Keane".

Lawrence G. Keane

CC: Todd Blanche, Deputy Attorney General
Daniel Driscoll, Acting Director, ATF
Russell Vought, Director, OMB