



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Martinsburg, WV 25405

www.atf.gov

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Dear (b) (6)

This refers to your electronic mail to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Branch, regarding attachment of receiver extensions on pistols other than AR-types. Your questions focused on the lawfulness of receiver extension (commonly referred to as a buffer tube) to the rear of the pistol similar to the *Kriss Special Duty Pistol (SDP) or Sig Sauer, Model P556*.

As background, the amended Gun Control Act of 1968 (GCA), 18 U.S.C. § 921(a)(3), defines the term “firearm” to include *any weapon (including a starter gun) which will or is designed to or may be readily converted to expel a projectile by the action of an explosive...[and]...the frame or receiver of any such weapon....*

With respect to the definitions of “handgun” and “pistol” under Federal statutes and regulations, you may be aware that the GCA, 18 U.S.C. § 921(a)(29), defines “handgun” to mean, in part: *...a firearm which has a short stock and is designed to be held and fired by the use of a single hand....*

Additionally, 27 CFR § 478.11, a regulation implementing the GCA, defines “pistol” as:

...a weapon originally designed, made, and intended to fire a projectile (bullet) from one or more barrels when held in one hand, and having (a) a chamber(s) as an integral part(s) of, or permanently aligned with, the bore(s); and (b) a short stock designed to be gripped by one hand and at an angle to and extending below the line of the bore(s).

Please note also that the GCA, 18 U.S.C. § 921(a)(7), defines “rifle” to mean, in part, *...a weapon designed or redesigned, made or remade, and intended to be fired from the shoulder....*

Finally, the National Firearms Act (NFA), 26 U.S.C. § 5845(a)(3), defines the term “firearm” to include *a rifle having a barrel or barrels of less than 16 inches in length...*

In your e-mail, you ask whether attaching an AR15 receiver extension to other firearms like the AR-type pistol, but with different manufacturers and mechanical actions, be considered the manufacture of an NFA-restricted firearm, or if the resulting product would have the same status as an AR-style pistol?

For your information, the Sig Sauer, Model P556 pistol and Kriss SDP, unlike an AR15-type pistol, do not utilize, or have any provision for, a receiver extension attached to the rear of the receiver. The receiver extension on an AR15-type pistol serves a legitimate, vital function in the operation of the weapon system, and is not considered to be a shoulder stock.

In contrast, a receiver extension is not designed or intended for attachment to a P556 pistol or Kriss SDP; instead, it is designed and intended to facilitate installation of a shoulder stock on a Sig Sauer Model 556 rifle and Kriss Super V rifle.

Therefore, adding a receiver extension to either weapon, which provides a barrel of less than 16 inches in length, would result in the manufacture of a short-barreled rifle as defined in the NFA, § 5845(a)(3).

We thank you for your inquiry and trust the foregoing has been responsive to your concerns

Sincerely yours,



Earl Griffith

Chief, Firearms Technology Branch

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