



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 correspondence to the Firearms Technology Branch (FTB), Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), regarding the legality, under Federal statutes, of using your Sig Sauer, Model PM400 pistol with the Sig SB15 brace attached; also, you want to know whether installing an "Angled Fore-grip (AFG)" such as the Magpul AFG onto this firearm would cause it to be reclassified as an "Any Other Weapon."

As you may be aware, the Gun Control Act of 1968 (GCA), 18 U.S.C. Section 921(a)(7) defines the term "rifle" to mean the following:

... a weapon designed or redesigned, made or remade, and intended to be fired from the shoulder and designed or redesigned and made or remade to use the energy of an explosive to fire only a single projectile through a rifled bore for each single pull of the trigger.

Also, the GCA, 18 U.S.C. Section 921(a)(8) defines the term "short barreled rifle" as—

...a rifle having one or more barrels less than sixteen inches in length and any weapon made from a rifle (whether by alteration, modification, or otherwise) if such weapon, as modified, has an overall length of less than twenty-six inches.

To answer your concerns about the PM400-and-brace, while the firearm was manufactured as a pistol, the SB15 brace is constructed of foam rubber with Velcro straps and is molded to a pistol-style buffer tube for an AR-style firearm; further, it is shaped to

form an upside- down "U." A shooter inserts his or her forearm into the device while gripping the pistol's handgrip—and then tightens the Velcro straps for additional support and retention. Thus configured, the device provides the shooter with enhanced support for the firearm while it is still operated with one hand. Our Branch has found that the SB15 brace utilized in this manner on an AR15 type pistol does not constitute a device designed and intended to fire a weapon from the shoulder. While a firearm so equipped would still be regulated by the GCA (Section 921(a)(3)), such a firearm would not be subject to National Firearms Act (NFA) controls.

Additionally, FTB has determined that neither the Magpul AFG nor the Magpul AFG2 are vertical fore-grips and, as such, would not cause an AR-15 type pistol having either one installed to be reclassified under the NFA as an "Any Other Weapon." We caution, however, that other similar devices may not share an identical classification depending on their specific features. We recommend that you contact FTB regarding the status of other grips should you contemplate installing them on your pistol. If we have not previously classified a specific grip, you may be requested to submit a sample to obtain a classification.

We trust the foregoing has been responsive to your request. If we can be of any further assistance, you may contact FTB at any time.

Sincerely yours,

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for
Earl Griffith

Chief, Firearms Technology Branch