



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Martinsburg, WV 25405

www.atf.gov

JAN 21 2016

907010 (b) (6)
3311/303907

(b) (6)

Steady Shot, LLC
5635 Sandbrook Lane
Hilliard, Ohio 43026

Dear (b) (6)

This is in reference to your correspondence, with enclosed sample, to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB). In your letter, you asked for a classification of a "universal pistol brace" (see enclosed photos). Additionally, you inquire as to the formal classification of a pistol with your "universal pistol brace" attached.

You state, *"the purpose and design of this brace is to allow the user to configure it either above or below the forearm for support purposes and recoil mitigation"*.

The FTISB evaluation revealed that the submitted device is constructed utilizing three main assemblies.

Assembly #1 consists of a dovetailed magazine floorplate measuring approximately (b) (4) inches in length and incorporating a detent hole which is compatible with the forward portion of Assembly #2. FTISB personnel noted this floorplate is assembled to a Smith & Wesson, Model M&P pistol magazine body, designed to hold 17 ammunition cartridges.

Assembly #2 is a metal portion measuring approximately (b) (4) inches in length and approximately (b) (4) inch at its major diameter. The forward portion of this assembly incorporates a dovetailed piece measuring approximately (b) (4) inches in length and is attached to a non-ferrous metal shaft by what appears to be threading. This forward piece incorporates a spring-loaded metal knob which is compatible with Assembly #1.

The rear portion of the aforementioned shaft has a non-ferrous metal part measuring approximately (b) (4) inches in length and approximately (b) (4) inch in diameter. This part

of assembly #2 is marked with "Accu-Pistol Brace" and www.accupistolbrace.com and is machined to incorporate a longitudinally machined hole for the attachment of assembly #3, and is internally threaded at its rear most portion to accept a retaining screw to maintain positioning of assembly #3 when assembled. This portion of assembly #3 is attached to the shaft port by threading and an unknown adhesive.

Assembly #3 consists of a ferrous metal piece which measures approximately (b) (4) inches in length. Assembly #3 is constructed utilizing a round metal rod machined with a series of holes, allowing assembly #3 to be attached to assembly #2 at various positions. Specifically, there are two series of (8) holes and a hole machined perpendicular to each of these series of holes, at the end on each arm of the metal angle. A piece of round foam material covers one arm of assembly #3.

As received, and assembled as depicted in the accompanying instructions, our Branch found this item does not incorporate straps, attachment points, or any component to allow for the attachment of the Accu-Pistol Brace to the operator's forearm. FTISB personnel determined the aforementioned device is designed to utilize the weight (downward pressure) of the host weapon to provide tension or support to the shooter's wrist, when assembly #3 is configured to allow the foam portion to be placed under the shooter's forearm when held and operated with one hand. Our Branch found the submitted device in of itself; is not regulated by the GCA or NFA provided the Accu-Pistol Brace is used as originally designed.

FTISB personnel determined the aforementioned device is useful to help control the recoil of the host weapon upon firing of the host weapon, when the foam piece of Accu-Pistol Brace is configured to be placed on top of the shooter's forearm.

However, FTISB personnel found that the machined holes located at either end of assembly #3 are so arranged, that when assembled as a complete device, allows the Accu-Pistol Brace to incorporate buttstock design features. This evaluation also found the foam portion of this "forearm brace" provides a surface contact area found on a buttstock assembly, when attached to a pistol.

As a part of this evaluation, FTISB personnel found that assembled in an alternate configuration, the Accu-shot pistol brace assembled S&W M&P pistol incorporates a "length of pull" of approximately 14-1/16 inches. A "length of pull" is a measurement found on shoulder fired weapons, generally measured from the center of the trigger to the center of the buttplate/ buttstock. FTISB personnel research has determined the average length of pull found on shoulder-fired weapons is approximately 13.5-14.5 inches. In the aforementioned alternate configuration, the subject pistol incorporates an overall length of approximately (b) (4) inches and a barrel length of approximately (b) (4) inches.

Based on our evaluation, our Branch finds that the submitted device, when attached to a pistol-type firearm, designs or redesigns and demonstrates intent for the host weapon to be fired from the shoulder when incorporating a distinguishable length of pull similar to those of shoulder-fired weapons such as shotguns and rifles.

Further, if the Steady Shot, LLC Accu-Pistol Brace as evaluated by our Branch; is assembled to a pistol, which would be the designing or redesigning or making or remaking of a weapon designed to be fired from the shoulder and if such a weapon incorporates a barrel length of less than 16 inches; this assembly would constitute the making of "a rifle having a barrel or barrels of less than 16 inches in length"; an NFA firearm as defined in 26 U.S.C. § 5845(a)(3).

A shoulder stock alone, without the pistol is not a "firearm" as defined. Mere sale or possession of the shoulder stock without the pistol is not a violation of the Federal regulations. However, the possession of such a assembled or disassembled device or a device assembled to a compatible pistol or in possession or control of a person, may constitute the constructive possession of an NFA firearm as defined, in 26 U.S.C. § 5845(a)(3).

We also suggest that you should contact your State law enforcement authorities to determine if manufacture, transfer, or possession of the submitted ACU-pistol brace would be affected by any State law or local ordinances.

To facilitate return of your sample, FTISB will return your sample via the accompanying FedEx account (b) (6) information. We thank you for your inquiry and trust the foregoing has been responsive to your evaluation request. Please do not hesitate to contact us if additional information is needed.

Sincerely yours,

(b) (6)

Chief, Firearms Technology Industry Services Branch

Enclosure

ACU-Pistol Brace Submitted 7/24/15



Assembly Instructions



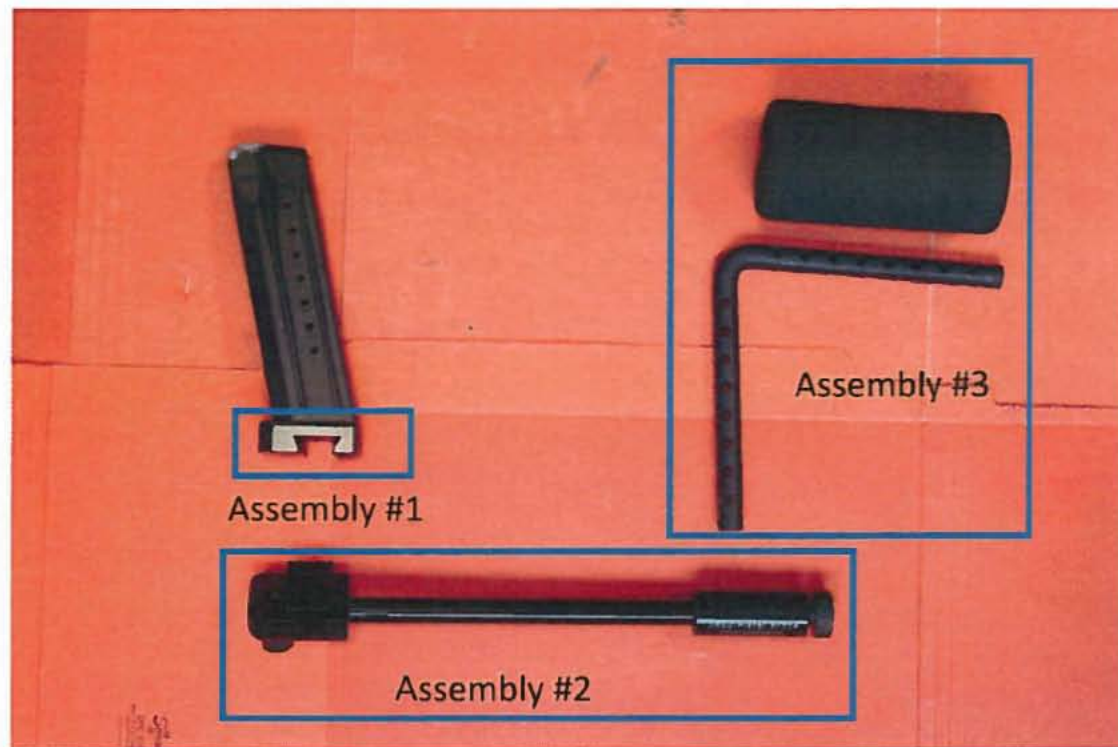
Assembled as Depicted in Instructions



Assembled for Left Handed Operator



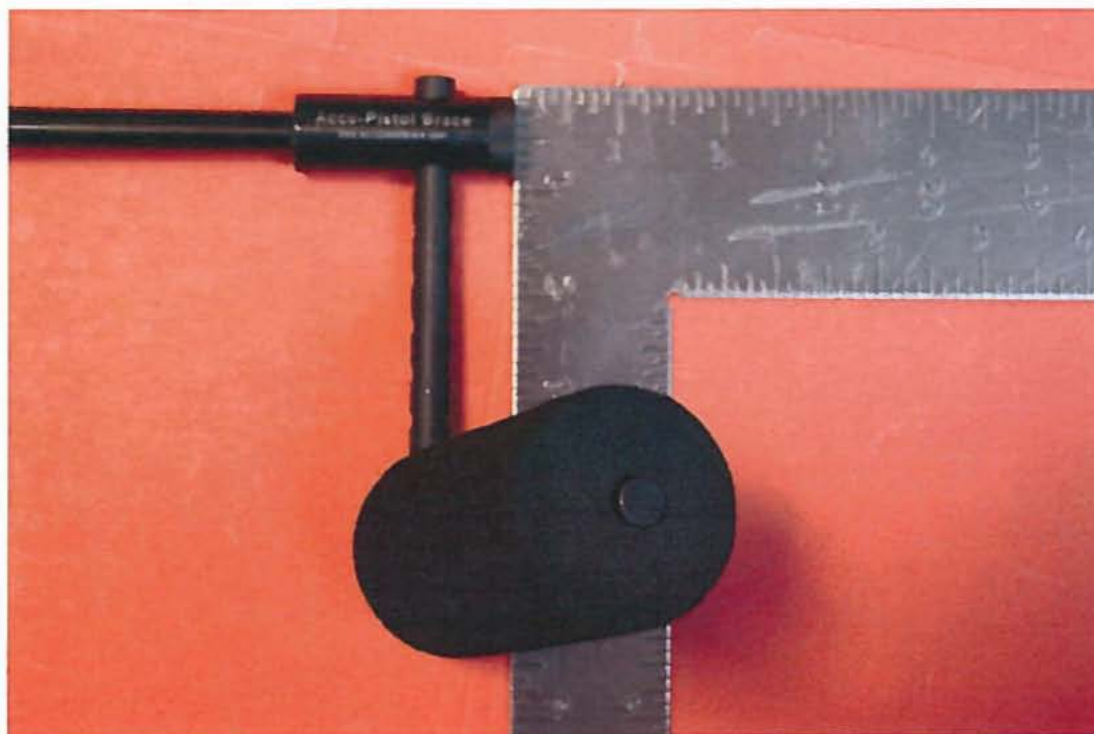
ACU-Pistol Brace Un-Assembled



S&W Model M&P Magazine with Assembly #1 Installed



Maximum Overall Depth of Device Installed Per Instructions



Maximum Overall Length of Device Installed Per Instructions



Machined Hole at end of Assembly #3



Alternate Configuration



Alternate Configuration



Overall Length of approximately (b) (4) inches

(b) (4)

Overall Length of approximately (b) (4) Inches

(b) (4)

Overall Length of approximately (b) (4) inches

(b) (4)

Alternate Configuration



Alternate Configuration



Alternate Configuration



Alternate Configuration



Alternate Configuration

