



U.S. Department of Justice

**Bureau of Alcohol, Tobacco,
Firearms and Explosives**

Martinsburg, WV 25405

www.atf.gov

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3311/305658

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Strike Industries
2842 S. Fairview ST
Santa Ana, CA 92704

Dear (b) (6)

This refers to your correspondence and accompanying sample to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB), which accompanied a sample of your company's "Strike Industries Stabilizer." You asked if attaching the brace to an AR-type pistol would cause the pistol to be classified as a "rifle" and thus a firearm subject to regulation by the National Firearms Act (NFA), specifically, 26 U.S.C. § 5845(a).

As you may know, shoulder stocks normally attach to the receiver of a shoulder-fired firearm. However, in the case of an AR-type, it attaches to the receiver extension, commonly referred to as the "buffer tube." A shoulder stock provides a means for the shooter to support the firearm and easily aim it when fired from the shoulder. With respect to the submitted device, you claim it is an accessory attachment designed to enhance the stability of an AR-type pistol by attaching to the operator's forearm. Stabilizing forearm braces generally would not change a pistol's classification to a "short-barreled rifle" because they do not design or redesign the firearm to be fired from the shoulder.

According to your correspondence, the "Strike Industries Stabilizer" is comprised of three major components:

1. Hard plastic shell designed to be attached to an AR-type pistol extension or "buffer" tube.
2. Velcro hook fastener surface glued to the plastic shell.
3. ACE Wrist Support that adheres to the Velcro hook fastener surface on the shell.

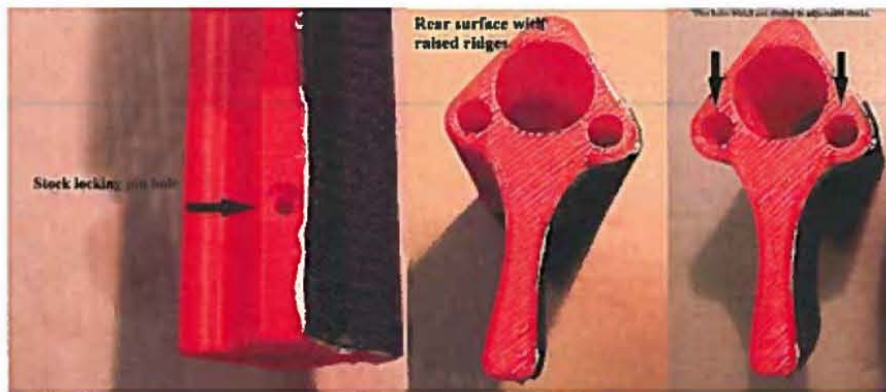
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Further, your description of the system states that it is intended to increase safety, stability and control *"during one-handed operation"* of AR-type pistols and *"is neither designed, nor intended for a user to fire a pistol from the shoulder."*

However, FTISB finds that the Strike Industries Stabilizer has several characteristics of some AR-type adjustable stocks. These characteristics include:

- Raised ridges on the rear surface of the "stabilizer."
- The hole on the underside of the "stabilizer" is consistent with an adjustable AR-type stock locking-pin.
- Two holes running lengthwise of the "stabilizer" that are consistent with other stocks designed with two rods for attachment, as opposed to a single buffer tube.

Strike Industries Stabilizer



The raised ridges serve to provide a non-slip surface, a characteristic of shoulder stocks. While this may be a consequence of the 3-D printing process, the front surface of the submitted prototype is noticeably smoother than the rear.

There is no mention in the supplied documentation as to the purpose of the locking-pin hole in the bottom of the "stabilizer" or the two holes that run lengthwise. The locking-pin hole is not shown in your drawings, but the two lengthwise holes are clearly displayed. As these are both characteristics found in some shoulder stocks that use mechanical means for adjustment, clarification of their intended purpose is required.

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We realize these characteristics may be incorporated into the submitted prototype by coincidence. However, to provide an accurate classification, we require detailed information regarding the intended function of the features listed above.

Sincerely yours,

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Chief, Firearms Technology Industry Services Branch