



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

DEC - 9 2005

www.atf.gov

903050 (b) (6)
3311/2005-560

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Greenlight Arms
4659 SE Mullenix Road
Port Orchard, Washington 98367

Dear (b) (6)

This is in response to your correspondence to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Branch (FTB), in which you requested FTB to make an determination regarding an accompanying partially finished rifle frame.

The submitted item resembles a sheet metal receiver of a Yugoslavian M70-AB2, Kalashnikov- type rifle. Additionally, a bolt guide and ejector rail accompanies this sample. Your letter states that you intend to sell partial frames of this type to "non FFL holders."

As received, the submitted sample serves as a template for the M70-AB2, with all of the required areas to be drilled or removed engraved on the external surface of the receiver; none of these areas have been completed. The bolt guide and ejector rails are not installed.

The FTB examination of this frame has found that none of the critical machining operations have been performed for the submitted sample to enable it meet the definition of a firearm. To assemble a functional firearm receiver from this frame, an individual would need to complete the following actions:

- Drill all holes to correct size.
- Machine the magazine well, trigger portal, and other required areas.
- Align and install the bolt and ejector rails using welds or other methods.
- Possibly undertake other minor machining operations.

In conclusion, the FTB examination of the submitted sample has determined that it does not meet the definition of a "firearm" found in 18 U.S.C. § 921(a)(3). This determination is relevant to the configuration of the incomplete frame described in this correspondence.

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Should any alterations or modifications be made to the design or configuration of this incomplete frame, the resulting product would be subject to further review.

We thank you for your inquiry and trust that the foregoing has been responsive to your request for an evaluation.

Sincerely yours,

A handwritten signature in black ink, appearing to read "S. Nixon", with a long horizontal flourish extending to the right.

Sterling Nixon
Chief, Firearms Technology Branch