

Congress of the United States

Washington, DC 20515

October 22, 2019

The Honorable Regina Lombardo
Acting Deputy Director
Bureau of Alcohol Tobacco Firearms & Explosives
99 New York Avenue NE
Washington, DC 20226

Dear Acting Deputy Director Lombardo:

We are writing to request that the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) allow its e-filing system to accept National Firearms Act (NFA) firearm transfer forms that have been electronically signed using DocuSign or similarly secure and tested technology. Doing so will both enhance the security and authenticity ATF needs for its e-filing system and benefit end users by allowing assistance from third-party processors.

Due to the complexity of the application process—including the e-filing system itself—consumers who wish to legally purchase NFA-regulated firearms have historically benefitted from third-party processors. These processors simplify and streamline the application process for consumers, and significantly decrease the error rates in submissions.

We understand that ATF has recently employed an e-filing system that only allows submissions using a “click-to-sign” feature and prevents the historical practice of uploading electronically-signed versions of the actual forms. Notably, ATF will continue to accept electronically signed forms that are physically submitted via mail, just not those that are e-filed.

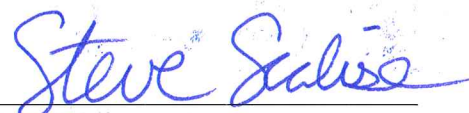
This “click-to-sign” process cannot be efficiently utilized by third-party processors. Therefore, consumers will be forced to choose between the benefits provided by third-party processors and the benefits of ATF’s e-filing system. Rather than force this choice, ATF should implement an e-filing system that allows third-party processors to submit application forms that have been signed and certified using DocuSign or similarly secure technology.

Electronic signature systems that are ISO 27001 and SSAE 16 certified, such as DocuSign, offer superior security, speed, and reliability standards. The signing parties' names, email addresses, locations, public IP addresses, digital signatures, and signature chain of custody are all captured and stored in a tamper-proof manner. These benefits support ATF’s mission, as well as the reason for building an electronic submission infrastructure in the first place.

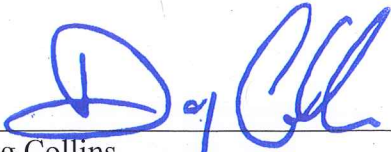
Sincerely,



Ken Buck
Member of Congress



Steve Scalise
Member of Congress



Doug Collins
Member of Congress



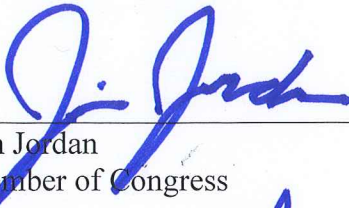
Thomas Massie
Member of Congress



Steve Chabot
Member of Congress



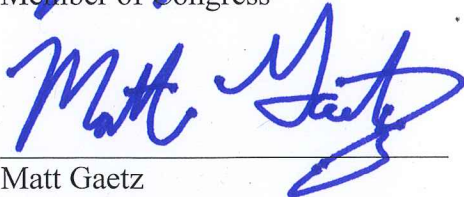
Louie Gohmert
Member of Congress



Jim Jordan
Member of Congress



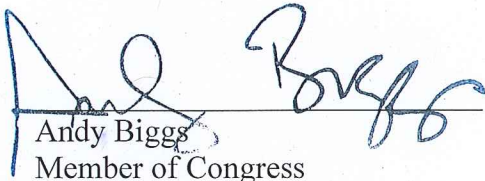
John Ratcliffe
Member of Congress



Matt Gaetz
Member of Congress



Mike Johnson
Member of Congress



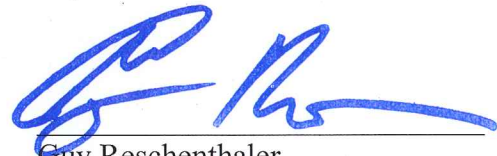
Andy Biggs
Member of Congress



Tom McClintock
Member of Congress



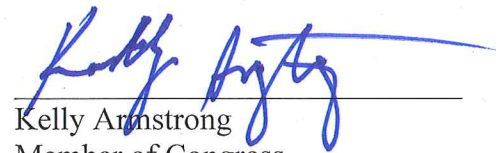
Debbie Lesko
Member of Congress



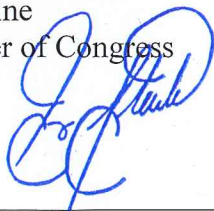
Guy Reschenthaler
Member of Congress



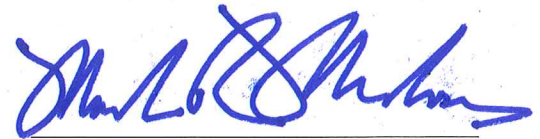
Ben Cline
Member of Congress



Kelly Armstrong
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W. Gregory Steube
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Mark Meadows
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Alex X. Mooney
Alex X. Mooney
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Paul A. Gosar, D.D.S.
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Ted S. Yoho, D.V.M.
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Bill Posey
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Steve King
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Bruce Westerman
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Lance Gooden
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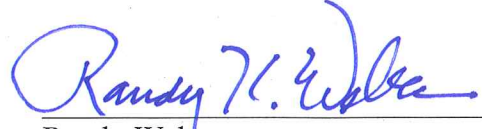
Mike Kelly
Member of Congress



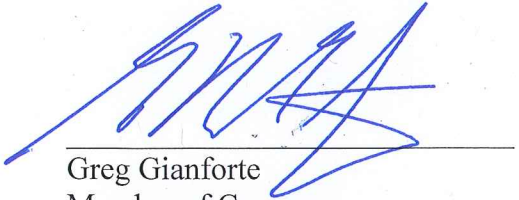
Ron Wright
Member of Congress



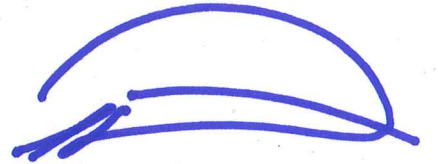
Rick Crawford
Member of Congress



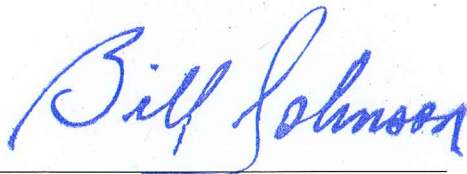
Randy Weber
Member of Congress



Greg Gianforte
Member of Congress



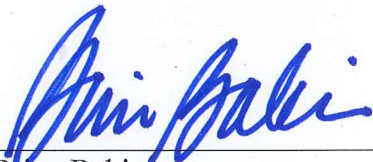
Scott DesJarlais
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Bill Johnson
Member of Congress




Adrian Smith
Member of Congress



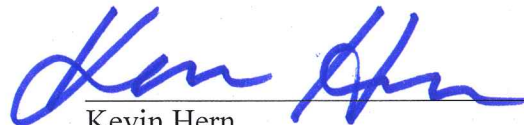
Brian Babin
Member of Congress



Carol D. Miller
Member of Congress



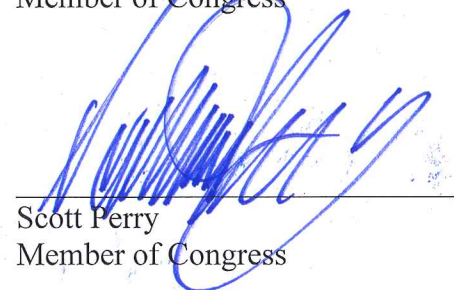
Ted Budd
Member of Congress



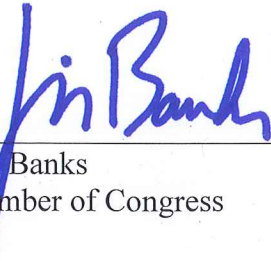
Kevin Hern
Member of Congress



Ralph Abraham, M.D.
Member of Congress



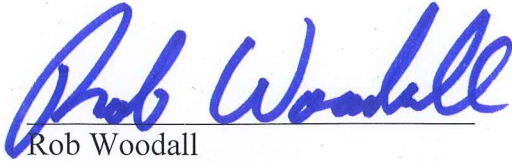
Scott Perry
Member of Congress



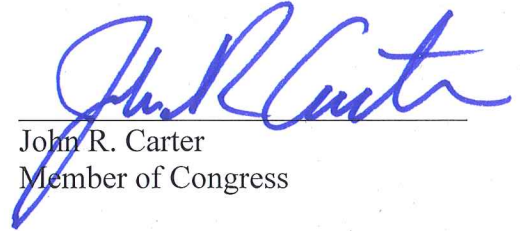
Jim Banks
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Rob Bishop
Member of Congress



Rob Woodall
Member of Congress



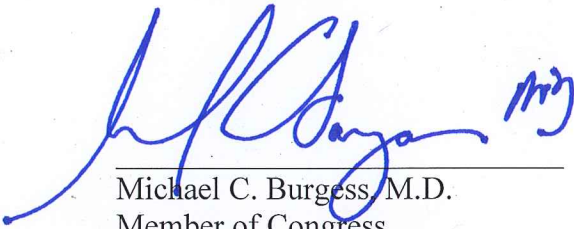
John R. Carter
Member of Congress



Russ Fulcher
Member of Congress



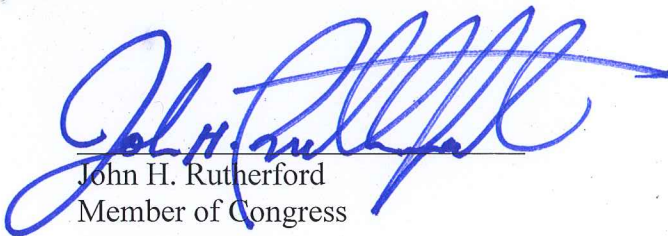
Michael Cloud
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Michael C. Burgess, M.D.
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Pete Olson
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John H. Rutherford
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Sam Graves
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