



GUN OWNERS OF AMERICA
THE ONLY NO-COMPROMISE GUN LOBBY IN WASHINGTON

RE: Removing Factoring Criteria for Firearms with Attached “Stabilizing Braces”



ADDRESSED TO

Office of Regulatory Affairs

Bureau of Alcohol, Tobacco, Firearms and Explosives
U.S. Department of Justice
Washington, DC 20226

SUBMITTED BY

Gun Owners of America
Gun Owners Foundation

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Re: Removing Factoring Criteria for Firearms with Attached “Stabilizing Braces,” RIN 1140-AA98, 91 Fed. Reg. 24453 (May 6, 2026).
Submitted by Gun Owners of America & Gun Owners Foundation.



GOA & GOF Comments to ATF on the “Stabilizing Brace” NPRM

GOA FEDERAL AFFAIRS | FORMAL COMMENTS ON RIN 1140-AA98 · 91 FED. REG. 24453 (MAY 6, 2026)

Re: Removing Factoring Criteria for Firearms with Attached “Stabilizing Braces” (RIN 1140-AA98)

DOJ RULEMAKING

On May 6, 2026, the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) published a notice of proposed rulemaking to “amend ... regulations on firearms with attached stabilizing braces.” 91 Fed. Reg. 24453, 24453-54 (May 6, 2026) (“NPRM”).¹ Specifically, the NPRM proposes to “rescind the changes made” by ATF’s previous Biden-era rulemaking on braced pistols, which had codified a multifactorial test for determining when a pistol equipped with a stabilizing brace qualified as a “short-barreled rifle” (“SBR”) subject to the National Firearms Act’s (“NFA”) registration requirements. *Id.* at 24456; see also 88 Fed. Reg. 6478 (Jan. 31, 2023) (“Biden Rule”).² Absent the Biden Rule’s test, the NPRM proposes to “rely on the statutory language without further elaboration.” NPRM at 24456. Even so, the NPRM then proceeds to elaborate, positing that each braced pistol has “unique characteristics,” and so ATF will only be able to determine whether it believes the weapon is an SBR upon “submission to FATD,” ATF’s Firearms and Ammunition Technology Division. *Id.* The NPRM seeks public comment by August 4, 2026 on “all aspects of this proposed rule and its costs and benefits,” as well as its “clarity ... and how it may be made easier to understand.” *Id.* at 24456, 24461.

IDENTITY OF COMMENTERS

Gun Owners of America, Inc. (“GOA”) is a California non-stock corporation headquartered in Springfield, Virginia. Organized as a nonprofit membership organization under Section 501(c)(4) of the Internal Revenue Code, GOA was founded in 1976 with the mission to preserve, protect, and defend the Second Amendment rights of gun owners. Today, GOA represents the interests of more than two million members and supporters nationwide, and routinely lobbies and litigates to vindicate the right to keep and bear arms throughout the country.

Gun Owners Foundation (“GOF”) is a Virginia non-stock corporation headquartered in Springfield, Virginia. GOF is a nonprofit legal defense and educational foundation exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code. Supported by a national donor base, GOF provides essential legal services and educational resources to the firearms community. Its activities include strategic litigation and administrative advocacy, including the submission of comments such as these intended to safeguard the enumerated right of the people to keep and bear arms.

GOA and GOF have a direct interest in this rulemaking, which will affect not only their individual members and supporters, but also thousands of firearm manufacturers and dealers that are industry members of GOA’s Caliber Club program. Additionally, GOA and GOF are plaintiffs in *Texas v. BATFE*, No. 6:23-cv-00013 (S.D. Tex.),³ a statutory and constitutional challenge to the Biden Rule and its underlying legal theory that “[f]ederal

1. See <https://www.govinfo.gov/content/pkg/FR-2026-05-06/pdf/2026-08930.pdf>.

2. See <https://www.govinfo.gov/content/pkg/FR-2023-01-31/pdf/2023-01001.pdf>.

3. See <https://www.courtlistener.com/docket/66800895/state-of-texas-v-bureau-of-alcohol-tobacco-firearms-and-explosives/>.

law requires a pistol with an attached stabilizing brace ... be registered as a short barreled rifle....”⁴ As the Trump White House recently explained, the Biden Rule “attack[ed] gun-owning Americans and undermine[d] the Second Amendment by ... subjecting otherwise lawful gun owners to up to 10 years in prison for failing to register pistol braces that make it possible for disabled veterans to use firearms....”⁵

Unfortunately, ATF’s “attack[s]” have only continued, with enforcement of the NFA against owners of braced pistols continuing *beyond* the Biden Rule’s universal vacatur, and well into the current Trump Administration. For instance, in *United States v. Taranto*, No. 1:23-cr-00229-CJN (D.D.C.), the Department of Justice insisted in 2024 that a braced pistol was an SBR under the same factorial analysis as the then-vacated Biden Rule, but without expressly “cit[ing], rely[ing] on, or mention[ing] the ATF’s 2023 rulemaking....”⁶ Rather, the Department claimed its classification “reflect[ed] ATF’s best understanding of the underlying statutory text and so ATF’s enforcement of the statute will necessarily incorporate factors like those discussed in the rule.”⁷ Then, even after the change in presidential administrations, ATF advised a GOA member via email in late 2025 that apparently *all* braced pistols were SBRs.⁸

Because the NFA’s onerous restrictions “have teeth” and “carr[y] severe consequences,” *Mock v. Garland*, 75 F. 4th 563, 570 (5th Cir. 2023), it “matters a great deal whether a firearm falls under the NFA.” NPRM at 24454. Thus, GOA and GOF submit these comments to ensure that the Biden ATF’s malicious targeting of braced pistols never occurs again.

SUMMARY OF COMMENTS

Children are taught that people are “unique as snowflakes.” But while that may be true *for people*, it does not follow for *braced pistols*. Yet that is exactly what the NPRM claims. While purporting to rescind the Biden ATF’s vague and unworkable factorial test, the NPRM replaces it with something far worse: an endorsement of “case-by-case classifications” for individual firearms that apparently “[e]ach” have “unique characteristics” and “unique designs.” Thus, if gun owners want any clarity as to whether *their* braced pistol is an SBRs under the NPRM, their only option is to make a “submission to FATD.” Gone are the Biden Rule’s factors, and seemingly here to stay are the standardless whims of nameless and faceless bureaucrats. The NPRM “provide[s]” the *opposite* of “clarity.” ATF’s new standard is clear as mud.

Making matters worse, the NPRM *defends* Biden-era gun control, whitewashes history, and refuses to concede the merits of the Biden Rule’s attack on gun owners, while also maligning braced pistols as instruments of crime. The NPRM reads as if it was written by an anti-gun Democrat administration – not an administration that promised to ‘rip up and tear out’ the Biden Rule on day one.

4. <https://storage.courtlistener.com/recap/gov.uscourts.txsd.1905516/gov.uscourts.txsd.1905516.99.1.pdf> at 1.

5. <https://storage.courtlistener.com/recap/gov.uscourts.txsd.1905516/gov.uscourts.txsd.1905516.104.1.pdf> at 19.

6. <https://storage.courtlistener.com/recap/gov.uscourts.dcd.257469/gov.uscourts.dcd.257469.73.0.pdf> at 12.

7. *Id.* at 16.

8. See <https://storage.courtlistener.com/recap/gov.uscourts.txsd.1905516/gov.uscourts.txsd.1905516.99.1.pdf> at 1.

COMMENTS ON PROPOSED RULE

1. Rather than Providing “Clarity” to Gun Owners, the NPRM Makes the Situation Worse by Rewriting the Statute and Seemingly Treating Every Single Braced Pistol as “Unique.”

a. ATF’s Long History of Vague and Contradictory Guidance.

At this point, ATF’s troubled history with the ubiquitous braced pistol is well-known. As the Fifth Circuit once observed, ATF’s regulations on this front “have not been a model of clarity.” *Mock v. Garland*, 75 F.4th 563, 571 (5th Cir. 2023). But rather than do anything to *fix* this sorry state of affairs, the NPRM only makes matters worse. In fact, the NPRM codifies ATF’s vaguest, most anti-gun position on braced pistols yet – one that surely would make Steve Dettelbach blush. A short history illustrates the point.

For the first five years following the stabilizing brace’s 2012 introduction to the market, ATF issued a series of conflicting classifications of various brace-equipped firearms. For instance, ATF initially took the position that certain brace-equipped firearms categorically were *not* rifles, and therefore *not* SBRs subject to the NFA, because they were not “designed or redesigned, made or remade, and intended to be fired from the shoulder....” 18 U.S.C. § 921(a)(7). ATF noted that its determination did not depend on individual use or misuse of a stabilizing brace, and so “the firing of a weapon from a particular position, such as placing the receiver extension of an AR-15 type pistol on the user’s shoulder” as if it was a rifle, “d[id] not change the classification of the weapon’....”⁹

But then, in 2015, ATF reversed itself in an open letter to members of the firearms industry, adopting a *new* theory that did indeed turn on individual use. As ATF claimed, the use of a stabilizing brace “as a shoulder stock constitutes a ‘redesign’ of the device because a possessor has changed the very function of the item.”¹⁰ Accordingly, under ATF’s 2015 interpretation, use of a braced pistol as *if* it were a rifle in fact *made it* a “rifle” under federal law. Under this illogic, holding a braced pistol to one’s ear and saying “hello” apparently would make it a telephone.

But ATF’s reversed interpretation did not last. In 2017, ATF walked back its prior position, explaining in a new classification letter that, “[t]o the extent that the January 2015 *Open Letter* implied or has been construed to hold that ... shoulder[ing] was sufficient to constitute ‘redesign,’ such interpretations are incorrect and not consistent with ATF’s interpretation of the statute or the manner in which it has historically been enforced.”¹¹

In reliance on ATF’s newfound tolerance of various models of braced pistol, these firearms exploded in popularity thereafter, with one 2021 report estimating the existence of some “10 to 40 million” examples in Americans’ hands.¹²

Things went well for several years. But then, during the final days of the first Trump Administration in late 2020, ATF sought to move away from its *ad hoc* classifications altogether, and so it proposed a rule to codify a supposedly “objective,” replicable standard to answer the braced-pistol-or-SBR question. See 85 Fed. Reg. 82516 (Dec. 18, 2020).¹³ But as these Commenters previously explained, ATF’s 2020 proposal “consisted of a 17-part balancing test, replete with numerous sliding scales and even secret criteria – each applied subjectively and considered ‘holistically.’”¹⁴ Faced with overwhelmingly negative public backlash, ATF withdrew its 2020 proposal days later. See 85 Fed. Reg. 86948 (Dec. 31, 2020).¹⁵

9. https://storage.courtlistener.com/recap/gov.uscourts.txsd.1905516/gov.uscourts.txsd.1905516.1.0_1.pdf at ¶159.

10. *Id.* ¶63.

11. *Id.* ¶70.

12. <https://www.congress.gov/crs-product/IF11763> at 2.

13. See <https://www.govinfo.gov/content/pkg/FR-2020-12-18/pdf/2020-27857.pdf>.

14. https://storage.courtlistener.com/recap/gov.uscourts.txsd.1905516/gov.uscourts.txsd.1905516.1.0_1.pdf at ¶100.

Unfortunately, it seems that failed attempt at rulemaking planted the seed for further action during the anti-gun Biden Administration. In 2021, the Biden ATF proposed “a worksheet that utilized an arbitrary (but clearly specified) three-part points system through which a firearm would be evaluated to determine whether it was a pistol or a rifle.”¹⁶ But like ATF’s 2020 proposal, that proposal never saw the light of day. In 2023, the Biden ATF ultimately adopted an *entirely different* standard in a final rule – a factorial test that asked (but did not answer) “*whether*” various features of a braced pistol were consistent with its use as a rifle. Indeed, the Biden Rule did not specify any numerical thresholds or a particular balance of factors that would dispositively classify a firearm one way or the other. It was, in other words, “impermissibly vague.” *Mock v. Garland*, 2024 U.S. Dist. LEXIS 105230, at *11 (N.D. Tex. June 13, 2024).

b. The NPRM Is ATF’s Vaguest Brace Rule Yet.

Unfortunately, now, even when faced with ATF’s history of repeated failed rulemakings and resounding judicial repudiations, the NPRM does not represent anything new. Rather, ATF apparently has chosen to repeat past mistakes. In fact, the NPRM does not even revert to the pre-Biden status quo. To the contrary, the NPRM seemingly creates a new rule even vaguer than the last.

Consider the NPRM’s self-contradictory terms. First, the NPRM asserts that ATF merely “proposes to rescind the changes made by the 2023 final rule and rely on the statutory language without further elaboration.” NPRM at 24456. Thus, the NPRM claims, “ATF is not issuing a new rule at this time.” *Id.* But if that were true, and the NPRM simply repealed the Biden Rule, then that would mean ATF’s prior brace classifications would be back in effect – including the ones that blessed the placement of particular braces on *any* type of pistol. That would also mean ATF would follow the statute’s plain terms, which focus on design *and* intent. The NPRM describes that prior regime perfectly:

FATD ultimately concluded that attaching the brace would not alter the classification of a pistol or other firearm and thus would not subject them to the provisions of the NFA. In the years following this initial classification, FATD received a number of inquiries regarding other firearms equipped with braces of varying designs and materials, some of which FATD concluded were ‘rifles.’” [NPRM at 24455.]

But that is not the regime the NPRM adopts. Instead, the NPRM claims that, going forward, “individuals would be able to purchase¹⁷ firearms with an attached ‘stabilizing brace’” without NFA registration, but *only “if the firearm is not intended to be fired from the shoulder and does not otherwise fall within the statutory definition....”* NPRM at 24457 (emphasis added); see also *id.* at 24458 (emphasis added) (reiterating “as long as the firearm *is not intended to be fired from the shoulder*”).

That is not “statutory language.” Rather, the statute requires that a rifle be “*designed or redesigned, made or remade, and intended to be fired from the shoulder....*” 18 U.S.C. § 921(a)(7) (emphases added). Not only does the NPRM apparently read *design* entirely out of the statute (just like the Biden NPRM did¹⁸), but also it omits *whose* intent it contemplates – the manufacturer’s, the buyer’s, or someone else’s. If ATF’s prior positions are any indication, perhaps ATF will use “[t]he manufacturer’s direct and indirect marketing and promotional materials” to demonstrate intent – *or even videos of various YouTubers firing the same gun.* Biden Rule at 6575, 6506 n.98.

But even if ATF focuses only on the *buyer’s* intent, the NPRM’s application to a real-world scenario exposes its absurdity. Consider two identically equipped, sequentially serial-numbered, AR-pattern braced pistols – the

15. See <https://www.govinfo.gov/content/pkg/FR-2020-12-31/pdf/2020-28930.pdf>.

16. https://storage.courtlistener.com/recap/gov.uscourts.txsd.1905516/gov.uscourts.txsd.1905516.1.0_1.pdf at ¶105.

17. Apparently forgetting that individuals can also *make* firearms, the NPRM is silent on whether gun owners can now make their own braces or braced pistols.

18. https://storage.courtlistener.com/recap/gov.uscourts.txsd.1905516/gov.uscourts.txsd.1905516.1.0_1.pdf at ¶119.

same make and model, from the same manufacturer, with indisputably the same “design.” One shooter buys one of these pistols, intending to strap its stabilizing brace to his forearm and shoot it at the range. A second shooter buys the second pistol five minutes later, intending to fire the pistol from his shoulder. Under the NPRM’s intent-only standard, the same type of firearm is Schrödinger’s SBR – a braced pistol based on one person’s intent, but an SBR based on another’s intent. That cannot be the law.

The problems with the NPRM do not end there. The NPRM goes on to claim that each and every braced pistol is “unique in some way,” and so ATF will have no way of determining whether it is in fact an SBR without “case-by-case classifications based on the unique designs of each firearm....” NPRM at 24456. But the Biden Rule’s factorial test at least provided *some* guideposts. Yet by claiming that each firearm requires individualized determination, the NPRM adopts an even vaguer standard. Indeed, if every braced pistol configuration is now as “unique” as a snowflake, then neither manufacturers, dealers, nor gun owners will be able to determine whether their *particular* firearm is an SBR without FATD’s definitive input.

That does not “provide clarity” (NPRM at 24456) – it chills the marketplace. Indeed, “[a] designation by an unnamed official, using unspecified criteria, that is put in a desk drawer, taken out only for use at a criminal trial, and immune from any evaluation by the judiciary, is the sort of tactic usually associated with totalitarian regimes.” *United States v. Pulungan*, 569 F.3d 326, 328 (7th Cir. 2009). Even worse than the Biden Rule, the NPRM creates a standard as vague as it gets, and will only invite totalitarian abuse.

2. The NPRM Inexplicably Defends Biden-Era Gun Control.

Making matters worse, the NPRM inexplicably seeks to whitewash history and *defend* the motives of the Biden Administration in promulgating its 2023 rule. In fact, the NPRM refuses to concede that the Biden Rule was unlawful and unconstitutional. That is not what gun owners expect from the “most pro-2A [DOJ] in US history,”¹⁹ and it contradicts the Trump White House’s own position on Biden-era gun control. ATF must retract its asinine defense of the Biden Rule and repudiate the Biden Rule’s underlying legal theories. Anything less than a full-throated rebuke of this “Biden disaster[]”²⁰ – President Trump’s words, not ours – will signal that ATF intends to reserve maximal power to continue prosecuting gun owners in the next Democrat administration.

Start with the NPRM’s bizarre defense of the Biden ATF’s motives. Rather than acknowledge that the Biden Rule “attack[ed] gun-owning Americans and undermine[d] the Second Amendment”²¹ – the *Trump White House’s* position on the matter – the NPRM claims “the goal of the 2023 final rule was to alleviate confusion by clarifying ATF’s position....” NPRM at 24456. That is hard to believe about a rule that conveniently declared practically all firearms with stabilizing braces to be SBRs.

Next, unlike ATF’s other recent rules that have conceded Biden-era gun control was “arguably unlawful” (91 Fed. Reg. at 24430), ATF apparently cannot bring itself to do the same with respect to pistol braces. In fact, the NPRM goes out of its way to take *no position* on the merits of the slew of successful legal challenges brought against the Biden Rule, simply regurgitating their holdings without commentary. In fact, the NPRM reads as if ATF has *no idea* what was wrong with the Biden Rule in the first place, stating that the Biden Rule “*may have been overinclusive or underinclusive....*” NPRM at 24456 (emphases added). But that’s like saying the current season is summer *or* winter.

The NPRM’s refusal to concede the merits is even more concerning in light of DOJ’s prior representations in court. In the *Taranto* case, DOJ defended its use of the Biden Rule’s vacated factors, on the theory that no “court ... has held the rule is an *incorrect interpretation* of the statute. All the courts’ holdings turn on purported

19. <https://x.com/AAGDhillon/status/1977148523838857499>.

20. <https://www.youtube.com/shorts/FOrVO-upDFo>.

21. <https://storage.courtlistener.com/recap/gov.uscourts.txsd.1905516/gov.uscourts.txsd.1905516.104.1.pdf> at 19.

defects with the rulemaking.”²² The NPRM’s claim that “ATF has never actively enforced the 2023 final rule” is therefore demonstrably false. NPRM at 24456. ATF *has* enforced the Biden Rule²³ – just by *calling* it something else.²⁴

Thus sanitized of any accountability for the prior ATF’s actions, the NPRM does not concede prior error, or promise to chart a new course. Rather, the NPRM concludes merely that “it is a waste of resources to continue defending and trying to enforce the 2023 [Biden] final rule.” NPRM at 24456. But that is not a repudiation of the Biden ATF’s legal theories, and it is hardly a guarantee that gun owners will be safe in the future. ATF’s final rule must do better.

3. The NPRM Claims Nonsense “Public Safety ... Disbenefits” that Do Not Exist.

As part of its so-called “sensitivity analysis” – whatever that is – the NPRM claims that reversing the Biden Rule may cause some “disbenefits” – whatever those are – in the form of a purported “reduction to public safety.” NPRM at 24457. While ATF claims these “disbenefits” are not “monetizable,” ATF claims they nonetheless are “qualitative,” on the theory that repealing the Biden Rule will allow gun owners to “circumvent [the] NFA” by allowing them to “affix purported ‘stabilizing braces’ designed to facilitate shooting from the shoulder....” *Id.* at 24459. As ATF tells it, “Congress chose to regulate short-barreled rifles” on the theory that they are “especially dangerous ... since they are used for violence and criminal activity.”²⁵ *Id.* And as ATF theorizes, “[s]hould a person choose to circumvent the NFA by effectively making unregistered ‘short-barreled rifles’ by attaching ... a ‘stabilizing brace,’ these dangerous, easily concealable weapons would pose an increased public safety concern.” *Id.* All of this anti-gun drivel is absolute nonsense, for a host of reasons.

Where to begin? For starters, ATF’s own Director has undermined the NPRM’s claims. In a recent interview, Director Cekada rejected the notion that people who possess braced firearms “only own it to go kill people,” noting that “these types of statements are not helpful to either side of this discussion....”²⁶ Nor, as the Director explained further, are braced firearms or SBRs commonly used in crimes – the overwhelming majority of which are committed with handguns.²⁷ Since neither rifles nor *short-barreled* rifles are commonly used in crimes, the NPRM’s claim that adding a stabilizing brace *makes handguns more like rifles* could not logically be claimed to increase violent crime. If anything, the opposite is true.

Equally absurd is ATF’s apparent belief that a firearm becomes *more* dangerous simply because it is “unregistered.” Circumventing the NFA’s onerous paperwork and registration requirements hardly equates to possessing ill intent or wanting the firearm for nefarious purposes. In fact, avoiding registration only thwarts the very first step of confiscation. See *Silveira v. Lockyer*, 328 F.3d 567, 569 (9th Cir. 2003) (Kozinski, J., dissenting from denial of rehearing en banc) (“All too many of the other great tragedies of history – Stalin’s atrocities, the killing fields of Cambodia, the Holocaust, to name but a few – were perpetrated by armed troops against unarmed populations.”).

Finally, ATF’s ridiculous attempt to link pistol braces with NFA circumvention, and NFA circumvention with violent crime, ignores real life. As ATF knows full well, it is lawful to purchase both an AR-15 rifle with a stock,

22. <https://storage.courtlistener.com/recap/gov.uscourts.dcd.257469/gov.uscourts.dcd.257469.73.0.pdf> at 16 n.1 (emphasis added).

23. See also <https://storage.courtlistener.com/recap/gov.uscourts.txsd.1905516/gov.uscourts.txsd.1905516.104.0.pdf> at 2 (Commenters recently opposing dismissal of their challenge to the Biden Rule, because “[w]ithout a reversion to the pre-Rule interpretive status quo ... Plaintiffs’ relief is incomplete”).

24. The NPRM likewise claims that “no one was investigated based solely on possessing a braced firearm.” NPRM at 24456. But that only proves that “he who writes the resolved clause wins the debate.” M. Stanton Evans.

25. ATF recently repeated this tired line in its defense of the NFA’s registration requirements in *Silencer Shop Found. v. BATFE*, No. 6:25-cv-00056-H (N.D. Tex.). See <https://storage.courtlistener.com/recap/gov.uscourts.txnd.406278/gov.uscourts.txnd.406278.60.0.pdf> at 30-31 (“targeting particularly dangerous weapons that ‘could be used readily and efficiently by criminals’”).

26. <https://www.youtube.com/watch?v=MEJmuUXPoeg> at 18:15.

and an AR-15 pistol without a stabilizing brace. Alternatively, it is lawful to purchase upper receivers and lower receivers for both of these types of firearms separately. Likewise, it is lawful to purchase rifle stocks by themselves, which are entirely unregulated. The point is this – anyone wishing to acquire an illicit SBR need only swap a buffer tube, or pop a couple of pins and install a different upper receiver. Since all the component parts are themselves unregulated by the NFA – only certain *configurations* are regulated – the NFA’s registration requirements have literally saved no lives, nor prevented any attack by those hellbent on engaging in “criminal activity.” Finally, both pistols with stabilizing braces *and* SBRs are protected “Arms” under the Second Amendment, which guarantees that “the right of the people to keep and bear Arms, shall not be infringed.” Thus, ATF’s ridiculous appeal to “public safety” is a nonstarter on its face, because it is “the traditions of the American people[] that demand[] our unqualified deference.” *N.Y. State Rifle & Pistol Ass’n v. Bruen*, 597 U.S. 1, 26 (2022).

Repeal of the disastrous Biden Rule in no way negatively implicates public safety. If anything, the opposite is true, because effective weapons are precisely what the Framers intended ordinary Americans to own – “being necessary to the security of a free State.” ATF should withdraw the NPRM’s ridiculous claims to the contrary.

CONCLUSION

This NPRM has squandered a perfect opportunity to deliver one of President Trump’s most repeated campaign promises to gun owners. Rather than ‘rip up and tear out’ the previous administration’s “disaster,”²⁸ the NPRM only makes it worse. ATF must repudiate the Biden Rule and its legal theories. Gun owners expect no less.

Respectfully submitted,



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GUN OWNERS OF AMERICA

27. *Id.* at 19:00.

28. <https://www.youtube.com/shorts/FOrVO-upDFo>.