

## DATA SUMMARY

**DATE:** April 18, 2007

**INSPECTOR:** Donellen Schlosser

**TITLE OF DATA:** IOI Survey Results

**PURPOSE:** To summarize results from the on-line survey of ATF Industry Operations Investigators. Analysis of both closed- and open-ended questions.

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### SUMMARY OF DATA:

#### Q2 Field Division

|       |                 | Frequency | Percent | Valid Percent | Cumulative Percent |
|-------|-----------------|-----------|---------|---------------|--------------------|
| Valid | Atlanta         | 9         | 3.0     | 3.0           | 3.0                |
|       | Baltimore       | 9         | 3.0     | 3.0           | 6.0                |
|       | Boston          | 11        | 3.7     | 3.7           | 9.7                |
|       | Charlotte       | 14        | 4.7     | 4.7           | 14.4               |
|       | Chicago         | 13        | 4.3     | 4.3           | 18.7               |
|       | Columbus        | 21        | 7.0     | 7.0           | 25.8               |
|       | Dallas          | 20        | 6.7     | 6.7           | 32.4               |
|       | Detroit         | 10        | 3.3     | 3.3           | 35.8               |
|       | Houston         | 12        | 4.0     | 4.0           | 39.8               |
|       | Kansas City     | 7         | 2.3     | 2.3           | 42.1               |
|       | Los Angeles     | 7         | 2.3     | 2.3           | 44.5               |
|       | Louisville      | 6         | 2.0     | 2.0           | 46.5               |
|       | Miami           | 10        | 3.3     | 3.3           | 49.8               |
|       | Nashville       | 18        | 6.0     | 6.0           | 55.9               |
|       | New Orleans     | 9         | 3.0     | 3.0           | 58.9               |
|       | New York        | 11        | 3.7     | 3.7           | 62.5               |
|       | Philadelphia    | 28        | 9.4     | 9.4           | 71.9               |
|       | Phoenix         | 19        | 6.4     | 6.4           | 78.3               |
|       | San Francisco   | 12        | 4.0     | 4.0           | 82.3               |
|       | Seattle         | 9         | 3.0     | 3.0           | 85.3               |
|       | St. Paul        | 16        | 5.4     | 5.4           | 90.6               |
|       | Tampa           | 13        | 4.3     | 4.3           | 95.0               |
|       | Washington D.C. | 15        | 5.0     | 5.0           | 100.0              |
|       | Total           | 299       | 100.0   | 100.0         |                    |

#### Q3 Number of years working as an IOI

|       |                      | Frequency | Percent | Valid Percent | Cumulative Percent |
|-------|----------------------|-----------|---------|---------------|--------------------|
| Valid | 1 year to 5 years    | 158       | 52.8    | 52.8          | 52.8               |
|       | 11 years to 15 years | 16        | 5.4     | 5.4           | 58.2               |

|                     |     |       |       |       |
|---------------------|-----|-------|-------|-------|
| 6 years to 10 years | 74  | 24.7  | 24.7  | 82.9  |
| More than 15 years  | 51  | 17.1  | 17.1  | 100.0 |
| Total               | 299 | 100.0 | 100.0 |       |

**Q4 What percentage of compliance inspections involve NFA weapons?**

|         | Frequency | Percent | Valid Percent | Cumulative Percent |
|---------|-----------|---------|---------------|--------------------|
| Valid 0 | 6         | 2.0     | 2.0           | 2.0                |
| 1       | 61        | 20.4    | 20.4          | 22.4               |
| 2       | 32        | 10.7    | 10.7          | 33.1               |
| 3       | 14        | 4.7     | 4.7           | 37.8               |
| 4       | 1         | .3      | .3            | 38.1               |
| 5       | 77        | 25.8    | 25.8          | 63.9               |
| 6       | 3         | 1.0     | 1.0           | 64.9               |
| 7       | 2         | .7      | .7            | 65.6               |
| 8       | 2         | .7      | .7            | 66.2               |
| 10      | 49        | 16.4    | 16.4          | 82.6               |
| 15      | 13        | 4.3     | 4.3           | 87.0               |
| 20      | 17        | 5.7     | 5.7           | 92.6               |
| 25      | 7         | 2.3     | 2.3           | 95.0               |
| 30      | 8         | 2.7     | 2.7           | 97.7               |
| 33      | 2         | .7      | .7            | 98.3               |
| 35      | 1         | .3      | .3            | 98.7               |
| 40      | 1         | .3      | .3            | 99.0               |
| 50      | 3         | 1.0     | 1.0           | 100.0              |
| Total   | 299       | 100.0   | 100.0         |                    |

**Q5 When do you request and Inventory Report from the NFA Branch?**

|  | Frequency | Percent | Valid Percent | Cumulative Percent |
|--|-----------|---------|---------------|--------------------|
| Valid 1 to 2 weeks prior to conducting compliance inspection | 147       | 49.2    | 49.2          | 49.2               |
| At least 2 weeks prior to conducting compliance inspection   | 75        | 25.1    | 25.1          | 74.2               |
| At the time of the compliance inspection                     | 6         | 2.0     | 2.0           | 76.3               |
| Less than a week prior to conducting compliance inspection   | 42        | 14.0    | 14.0          | 90.3               |
| Other  | 29        | 9.7     | 9.7           | 100.0              |
| Total  | 299       | 100.0   | 100.0         |                    |

**Q5A Once requested, how many days does it take to receive an Inventory Report?**

|         | Frequency | Percent | Valid Percent | Cumulative Percent |
|---------|-----------|---------|---------------|--------------------|
| Valid 0 | 17        | 5.7     | 5.8           | 5.8                |

|                |     |       |       |       |
|----------------|-----|-------|-------|-------|
| 1              | 18  | 6.0   | 6.1   | 11.9  |
| 2              | 49  | 16.4  | 16.7  | 28.7  |
| 3              | 48  | 16.1  | 16.4  | 45.1  |
| 4              | 29  | 9.7   | 9.9   | 54.9  |
| 5              | 50  | 16.7  | 17.1  | 72.0  |
| 6              | 9   | 3.0   | 3.1   | 75.1  |
| 7              | 24  | 8.0   | 8.2   | 83.3  |
| 8              | 8   | 2.7   | 2.7   | 86.0  |
| 10             | 17  | 5.7   | 5.8   | 91.8  |
| 14             | 14  | 4.7   | 4.8   | 96.6  |
| 15             | 2   | .7    | .7    | 97.3  |
| 18             | 1   | .3    | .3    | 97.6  |
| 21             | 4   | 1.3   | 1.4   | 99.0  |
| 30             | 2   | .7    | .7    | 99.7  |
| 180            | 1   | .3    | .3    | 100.0 |
| Total          | 293 | 98.0  | 100.0 |       |
| Missing System | 6   | 2.0   |       |       |
| Total          | 299 | 100.0 |       |       |

**Q6 How often would you say there is a discrepancy between the Inventory Report and the FFL inventory?**

|                  | Frequency | Percent | Valid Percent | Cumulative Percent |
|------------------|-----------|---------|---------------|--------------------|
| Valid            | 1         | .3      | .3            | .3                 |
| Always           | 49        | 16.4    | 16.4          | 16.7               |
| Don't Know       | 26        | 8.7     | 8.7           | 25.4               |
| Most of the time | 90        | 30.1    | 30.1          | 55.5               |
| Never            | 15        | 5.0     | 5.0           | 60.5               |
| Sometimes        | 118       | 39.5    | 39.5          | 100.0              |
| Total            | 299       | 100.0   | 100.0         |                    |

**Q7 How often is the discrepancy due to an error in the NFRTR?**

|                  | Frequency | Percent | Valid Percent | Cumulative Percent |
|------------------|-----------|---------|---------------|--------------------|
| Valid            | 1         | .3      | .3            | .3                 |
| Always           | 30        | 10.0    | 10.0          | 10.4               |
| Don't Know       | 47        | 15.7    | 15.7          | 26.1               |
| Most of the time | 103       | 34.4    | 34.4          | 60.5               |
| Never            | 19        | 6.4     | 6.4           | 66.9               |
| Sometimes        | 99        | 33.1    | 33.1          | 100.0              |
| Total            | 299       | 100.0   | 100.0         |                    |

**Q8 How often is the discrepancy due to an error by the FFL?**

|                  | Frequency | Percent | Valid Percent | Cumulative Percent |
|------------------|-----------|---------|---------------|--------------------|
| Valid            | 1         | .3      | .3            | .3                 |
| Don't Know       | 56        | 18.7    | 18.7          | 19.1               |
| Most of the time | 6         | 2.0     | 2.0           | 21.1               |

|           |     |       |       |       |
|-----------|-----|-------|-------|-------|
| Never     | 61  | 20.4  | 20.4  | 41.5  |
| Sometimes | 175 | 58.5  | 58.5  | 100.0 |
| Total     | 299 | 100.0 | 100.0 |       |

**Q10 How many times in the past year have you referred an FFL to a Special Agent based on a discrepancy between the inventory report and the FFL inventory?**

|                | Frequency | Percent | Valid Percent | Cumulative Percent |
|----------------|-----------|---------|---------------|--------------------|
| Valid 0        | 272       | 91.0    | 91.3          | 91.3               |
| 1              | 20        | 6.7     | 6.7           | 98.0               |
| 2              | 5         | 1.7     | 1.7           | 99.7               |
| 3              | 1         | .3      | .3            | 100.0              |
| Total          | 298       | 99.7    | 100.0         |                    |
| Missing System | 1         | .3      |               |                    |
| Total          | 299       | 100.0   |               |                    |

**Q10A What have been the results of these referrals?**

|   | Frequency | Percent | Valid Percent | Cumulative Percent |
|---|-----------|---------|---------------|--------------------|
| Valid   | 273       | 91.3    | 91.3          | 91.3               |
| A destructive device was seized for failure to demil it in accord with ATF requirements. The dd was not registered. | 1         | .3      | .3            | 91.6               |
| An abandonment was taken on the firearm in question   | 1         | .3      | .3            | 92.0               |
| An unregistered destructive Device (Street Sweeper) was seized by the ATF.  | 1         | .3      | .3            | 92.3               |
| ATF seized two unregistered silencer tubes.   | 1         | .3      | .3            | 92.6               |
| Don't know.   | 1         | .3      | .3            | 93.0               |
| FFL indicted, criminal charges pending in part for unregistered NFA weapons.  | 1         | .3      | .3            | 93.3               |
| FFL voluntarily surrendered license and abandoned weapon to ATF.  | 1         | .3      | .3            | 93.6               |
| Haven't used the system yet   | 1         | .3      | .3            | 94.0               |
| I am not sure that criminal enforcement has acted on the referral yet.  | 1         | .3      | .3            | 94.3               |
| Illegal firearms were seized.   | 1         | .3      | .3            | 94.6               |

|   |     |       |       |       |
|---|-----|-------|-------|-------|
| In all three instances the NFA wepaons were not registered, and the ATF Special Agents Seized them as contraband.   | 1   | .3    | .3    | 95.0  |
| na  | 1   | .3    | .3    | 95.3  |
| Not known.  | 1   | .3    | .3    | 95.7  |
| pending, I never received an answer   | 1   | .3    | .3    | 96.0  |
| Please see the comments, second paragraph, under question # 9 - it involved an unregistered, privately manufactured, full auto weapon which was referred to ATF LE. | 1   | .3    | .3    | 96.3  |
| There were no records on the firearm - therefore I was not sure if # 10 should be zero or one.  |     |       |       |       |
| Referral still pending; no action was taken yet.  | 1   | .3    | .3    | 96.7  |
| Seizure of an unregistered NFA weapon (Suppressor).   | 1   | .3    | .3    | 97.0  |
| Still pending   | 1   | .3    | .3    | 97.3  |
| The first instance resulted in the abandonment of the firearm. The second instance has not been disclosed to industry operations.                                   | 1   | .3    | .3    | 97.7  |
| Unknown   | 3   | 1.0   | 1.0   | 98.7  |
| Unknown, I never recieved a reply from the NFA in regards to any actio taken on their part to correct the problems with inventory.                                  | 1   | .3    | .3    | 99.0  |
| Unknown. According to the FFL, he was never contacted by anyone for resolution. He has NFA weapons in his name that he says he knows nothing about.                 | 1   | .3    | .3    | 99.3  |
| Unregistered NFA weapons were seized.   | 1   | .3    | .3    | 99.7  |
| Unregistered silencer surrendered to ATF SA.  | 1   | .3    | .3    | 100.0 |
| Total   | 299 | 100.0 | 100.0 |       |

**Q11 How satisfied are you with the accuracy of the inventory reports?**

|                                    | Frequency | Percent | Valid Percent | Cumulative Percent |
|------------------------------------|-----------|---------|---------------|--------------------|
| Valid                              | 2         | .7      | .7            | .7                 |
| Dissatisfied                       | 79        | 26.4    | 26.4          | 27.1               |
| Don't Know                         | 15        | 5.0     | 5.0           | 32.1               |
| Neither Satisfied Nor Dissatisfied | 93        | 31.1    | 31.1          | 63.2               |
| Satisfied                          | 71        | 23.7    | 23.7          | 87.0               |
| Very Dissatisfied                  | 28        | 9.4     | 9.4           | 96.3               |
| Very Satisfied                     | 11        | 3.7     | 3.7           | 100.0              |
| Total                              | 299       | 100.0   | 100.0         |                    |

**Quantitative analysis to closed-ended questions is in the following file:**

**Analysis of the open-ended questions:**

*Q12 - How do errors and discrepancies in NFRTR inventory reports affect your ability to carry out compliance inspections?*

The IOIs cannot work as quickly or as efficiently when the inventory report contains errors. It is more difficult to complete the inspection because of the extra steps necessary to locate the weapons and the correct paperwork from the FFL. This calls into question the accuracy of the information from the NFRTR, reflects poorly on ATF, and makes it difficult to hold FFLs accountable for correct records when the NFRTR is not held to the same standards. Often, follow-up work is required, but the records are not updated in the NFRTR. However, some IOIs indicate that there is no disruption because a full inventory is part of the inspection process and they must complete it regardless of any errors in the NFRTR inventory report.

Out of 297 total responses:

- 53 indicated there was no disruption to the inspection process.
- 75 indicated the errors called into question the accuracy of the information from the NFRTR.
- 127 stated their efficiency was affected and the inspection took more time to perform.
- 48 stated it was more difficult to plan and complete the inspection.
- 12 stated follow-up work was required after the inspection.
- 32 indicated N/A, or they had not encountered errors in this situation.
- 1 stated the only errors he had encountered were on the part of the FFL.

*Q13 - How do errors and discrepancies in the NFRTR inventory reports affect the FFLs you inspect?*

The IOIs state that many FFLs are concerned about the accuracy of the information in the NFRTR, and frustrated that it is so inaccurate when they are responsible for keeping their own records up-to-date. The FFLs are helpful, but are frustrated by the burden of providing duplicate paperwork to verify their weapon inventories and transactions. Some FFLs are worried about being unduly cited with violations. Some IOIs state that there are no problems with the NFRTR, and others say that the FFLs are unaware of or unconcerned with NFRTR discrepancies. A small percentage of IOIs used this question to restate their procedures for completing an inspection or correcting an error in the inventory report.

Out of 297 total responses:

- 78 IOIs stated that FFLs are concerned about the accuracy of the NFRTR.
- 88 stated that FFLs are frustrated that the NFRTR is inaccurate and the inspections are difficult to complete.
- 19 stated that FFLs are worried about being investigated or cited with violations.
- 4 IOIs indicated that there are no problems with the NFRTR, or that any errors are on the part of the FFL.
- 80 IOIs indicated N/A, or that there are no problems with the NFRTR.
- 39 restated their standard procedures for inspections, or refer back to their answer for Q12.
- 5 IOIs stated that FFLs are unaware or unconcerned with NFRTR discrepancies.
- 12 IOIs stated that FFLs are frustrated with the high standards to which they are held, while the NFRTR information is not subjected to the same criteria of accuracy and completeness.
- 3 IOIs stated that FFLs have noticed the improvement in customer service since the NFA Branch has moved to West Virginia.

*Q14 - Do you have any suggestions for improving the NFRTR inventory reports or the work of the NFA Branch?*

The IOIs suggest improvements and updates to the NFRTR database. They believe the computer system itself should be examined and updated, and they would like to see online request forms or at least be able to email an inventory report request instead of faxing it to the Branch. They suggest hiring more personnel and training them properly, and updating the Branch's standard procedures – to include assigning specialists to areas of the database, correct discrepancies, and double-check information. Several IOIs suggest

standardizing the database's information. Many suggest a review of the database, and they would do inspections aimed at verifying the NFRTR data. Many would like changes made to the report format because it is difficult to read. Many IOIs have positive comments, and many believe that the NFA Branch has improved in the past few years (roughly correlating with the move to West Virginia).

Out of 278 total responses:

- 18 IOIs stated that they would like access to the NFRTR database for update or search purposes.
- 5 IOIs stated that the search methods within the NFRTR should be changed (Specialists should be able to search more efficiently).
- 19 IOIs stated that they would appreciate better communication from the NFA Branch, and 6 IOIs asked for better customer service.
- 13 IOIs stated that the computer system could be improved.
- 4 IOIs stated that some form of guidance should be distributed to the field offices or FFLs.
- 10 IOI stated that the NFA Branch has improved, with 7 stating that they believe the improvement was a result of the move to West Virginia.
- 75 IOIs had no response.
- 26 IOIs commented on NFA personnel. 21 IOIs stated that the NFA Branch needed more personnel.
- 18 IOIs stated that the reports needed improvement, especially in the format.
- 3 IOIs asked to change the report request process.
- 43 IOIs stated that a change in standard procedures was needed. (8 IOIs asked to have specialists assigned to specific areas; 5 IOIs asked to have errors corrected in the database; 6 IOIs stated that the database information should be double-checked; 2 IOIs stated that the database fields and information should be standardized.)
- 5 IOIs stated that NFA Branch needed more training.
- 43 IOIs stated that updates were needed – to update or correct the database in a more timely fashion, and to reduce the time between receipt and approval by the NFA Branch. This includes updating transaction request data and removing out-of-date information.

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**ADDITIONAL INFORMATION OBTAINED:**

**CONCLUSION:**

**Q9 Process - What do you do when there is a discrepancy between the NFRTR inventory report and the FFL inventory? Please describe the process and the actions you take.**

- When IOIs find discrepancies during compliance inspections, they complete worksheets describing the discrepancies, usually obtain copies of the transfer paperwork corresponding to the NFA items for which the FFL's actual inventory does not match the NFRTR inventory report, and send all the material to the NFA Branch. Some IOIs may delve into the information to try to determine the source of the problem, and some call the NFA Branch directly to resolve the issue, sometimes on site at the FFL.
- There were 298 Responses to Q9 (*the following are not mutually exclusive*)
  - 11 NA
  - 14 IOIs indicated that they had never encountered a discrepancy
  - 74 IOIs indicated that discrepancies are assumed to be a problem with the NFRTR
  - 2 IOIs indicated that they contact Gary Schaible
  - 18 included negative comments about the NFA Branch
    - 12 pertained to the NFRTR not being updated to reflect discrepancies identified by inspector
    - 4 pertained to the NFA Branch being unresponsive to calls and messaged from IOIs trying to resolve discrepancies
    - 1 stated that the NFA Branch was uncooperative
    - 1 stated "I was informed that NFA Branch had destroyed a large number of Form 6 and 6A (sometime in the 1990's) and could not compile a complete listing of NFA weapons. My inspection team was forced to rely on proprietor information and previous inspection reports to reconcile the licensee's NFA inventory."
  - 3 included positive comments about the NFA Branch
    - "Discrepancies have always been promptly fixed."
    - "I contacted Denise Brown at the NFA Branch. Ms. Brown was very helpful and we were able to discern that NFA records accurately reflected the current ownership of the firearms."
    - "I usually call Gary Schaible in NFA to verify the discrepancy. He is very good at making immediate corrections."
  - Suggestion
    - After the IOIs report discrepancies, have the NFA Branch follow-up with them to let them know how they were resolved

## **Analysis of Q12 Affect IOI - How do errors and discrepancies in NFRTR inventory reports affect your ability to carry out compliance inspections?**

- **Summary**
  - The IOIs cannot work as quickly or as efficiently when the inventory report contains errors. It is more difficult to complete the inspection because of the extra steps necessary to locate the weapons and the correct paperwork from the FFL. This calls into question the accuracy of the information from the NFRTR, reflects poorly on ATF, and makes it difficult to hold FFLs accountable for correct records when the NFRTR is not held to the same standards. Often, follow-up work is required, but the records are not updated in the NFRTR. However, some IOIs indicate that there is no disruption because a full inventory is part of the inspection process and they must complete it regardless of any errors in the NFRTR inventory report.
  
- **Responses to Q12 (not mutually exclusive)**
  - Out of 297 total responses:
    - 53 indicated there was no disruption to the inspection process.
    - 75 indicated the errors called into question the accuracy of the information from the NFRTR.
    - 127 stated their efficiency was affected and the inspection took more time to perform.
    - 48 stated it was more difficult to plan and complete the inspection.
    - 12 stated follow-up work was required after the inspection.
    - 32 indicated N/A, or they had not encountered errors in this situation.
    - 1 stated the only errors he had encountered were on the part of the FFL.
  - Examples of positive quotes
    - “The only errors I have encountered is on the part of the FFL. I was able to conduct the inspection, have weapons seized and in one case- Revoke the license of the FFL.”
    - “The NFRTR inventory reports are helpful when trying to reconcile the physical inventory.”
    - “I have heard from other IOIs, FFLs and from citizens that own registered NFA weapons that the process of filing paperwork and the accuracy of the reports has improved since the relocations of the NFA Branch.”
    - “As the inventory reports are fairly accurate, they do not negatively affect the inspection process.”
  - Examples of negative quotes
    - “It is difficult to plan inspections of NFA licensees if the information provided by the NFRTR is incorrect.”
    - “The inaccuracies on the NFA print-outs make the field inspection more difficult and much more time consuming. I end up having to go through the proprietor's transfer records to locate where the NFA weapons were transferred. Then I end up submitting a detailed report to the NFA Branch telling them what changes need to be made to their NFA report. Usually these changes are never made (by NFA) so the next Investigator gets stuck

re-verifying these same discrepancies during their next inspection. I hesitate to discuss NFA discrepancies with the dealer because I'm never quite sure if the inaccuracies are with the proprietor's records or the NFA report."

- "Many times the FFL will state that they have reported the error or that the error came up in a previous compliance inspection and should have been corrected."
- "Since there is no requirement for the Transferor of an NFA firearm to keep a copy of an approved transfer form once the firearm is transferred, it is very difficult to determine if the transfer took place correctly without contacting each licensee or person to whom the firearms were sold."
- "Errors and discrepancies make ATF, as a whole, look inept. These are extremely important records and our own NFA Branch can't even get it right. It takes extra hour(s) to rectify these problems, and sometimes we find out 1-2 years down the road on the next inspection that the corrections we forwarded to the NFA Branch aren't even taken care of by the next inspection."
- "It is hard to verify any NFA inventory when the "official" NFRTR record is inaccurate. I have had to rely on the licensee's records over the NFRTR record in the past."
- "We are unable to complete our inspections in a timely manner because it takes so long to get accurate information."
- "Errors create more work in the field (time on site)."
- Other quotes:
  - "I ask the licensee to provide verification of registration anyway, so it doesn't usually affect my inspection."
  - "NFRTR inventory reports are a guideline to use on inspections and not necessarily correct. I just have to make sure the report is updated and correct by the time my inspection is complete and NFRTR has been notified of any changes/additions to the report."
  - "They do not affect my ability to complete the inspection once I have reconciled the differences."
  - "It does not affect my ability to carry out compliance inspections. It increases the length of time needed to complete the inspection."
  - One IOI describes the fear he and the FFLs feel: "I can do the inspections, the most noticeable problem I have is the fear in ATF employees when it comes to NFA Firearms. I must admit that I get it too. I am very conscious that I could get fired when it comes to doing inspections involving these type of firearms and do not look forward to them when they appear in my NSpect. The errors and discrepancies become annoying in that every time one pops it is very situational and I have to think very carefully on how I am going to resolve it. I have been advised I should request access directly to the NFRTR but have not because I prefer to request it for each inspection. This is due to my fear and the low frequency I get these type of assignments."
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## **Analysis of Q13 Affect FFL - How do errors and discrepancies in the NFRTR inventory reports affect the FFLs you inspect?**

- **Summary**
  - The IOIs state that many FFLs are concerned about the accuracy of the information in the NFRTR, and frustrated that it is so inaccurate when they are responsible for keeping their own records up-to-date. The FFLs are helpful, but are frustrated by the burden of providing duplicate paperwork to verify their weapon inventories and transactions. Some FFLs are worried about being unduly cited with violations. Some IOIs state that there are no problems with the NFRTR, and others say that the FFLs are unaware of or unconcerned with NFRTR discrepancies. A small percentage of IOIs used this question to restate their procedures for completing an inspection or correcting an error in the inventory report.
  
- **Responses for Q13 (not mutually exclusive)**
  - Out of 297 total responses:
    - 78 IOIs stated that FFLs are concerned about the accuracy of the NFRTR.
    - 88 stated that FFLs are frustrated that the NFRTR is inaccurate and the inspections are difficult to complete.
    - 19 stated that FFLs are worried about being investigated or cited with violations.
    - 4 IOIs indicated that there are no problems with the NFRTR, or that any errors are on the part of the FFL.
    - 80 IOIs indicated N/A, or that there are no problems with the NFRTR.
    - 39 restated their standard procedures for inspections, or refer back to their answer for Q12.
    - 5 IOIs stated that FFLs are unaware or unconcerned with NFRTR discrepancies.
    - 12 IOIs stated that FFLs are frustrated with the high standards to which they are held, while the NFRTR information is not subjected to the same criteria of accuracy and completeness.
    - 3 IOIs stated that FFLs have noticed the improvement in customer service since the NFA Branch has moved to West Virginia.
  
  - Examples of positive comments
    - “I always ask FFLs about their experiences with transfers, etc and they have unanimously reported that their turn around times and overall results have improved since the NFA Branch has been relocated to WVA.”
    - “I have only found errors with the FFL not the NFRTR reports.”
    - “[One FFL] stated that they are much more customer service oriented and supportive to the industry, and more efficient than they have ever been in the past.”
  
  - Examples of negative comments

- “When repetitive errors are found in the NFRTR the FFLs lose their confidence in the integrity of the system.”
- “Many FFL's are familiar with the knowledge that the list is not 100% accurate. Again, this effects one's confidence level going into the inspection.”
- “While the burden of proof is generally placed upon the FFL to demonstrate that the firearms were properly transferred, incorrect information from the NFRTR can cause an undue burden for those FFL's who have properly transferred the firearms yet must spend days or weeks searching for documentation to prove these transfers.”
- “The FFL's get frustrated and assume that inspectors are inept just because of a error in the NFRTR inventory report. The FFL's then tend to tune out any suggestions or advice we give to them to help them in remaining or becoming compliant.”
- “FFL's are upset, become very concerned, and fear any possible liability or action that might be erroneously taken against them as a result.”
- Other Quotes
  - “Usually, FFLs are unaware of the discrepancies.”
  - “They complain about them but are not overly concerned.” “Discrepancies in the NFRTR cause the FFL to perform forward traces.”
  - “The only error or discrepancy that hinders my ability to carry out my inspection is when the NFRTR inventory report has firearms under the official business name and separate firearms under the trade name.”
  - “One thing that I try to remember, I am a representative of ATF and anytime a FFL gets the opportunity to compliant or bad mouth the agency I take in strides.”
  - “They [the FFLs] feel that if their inventory was ever challenged that they would lose the fight because, in their opinion, the Branch says it is always right.”

**Analysis of Q14 Suggestions - Do you have any suggestions for improving the NFRTR inventory reports or the work of the NFA Branch?**

- **Summary**
  - The IOIs suggest improvements and updates to the NFRTR database. They believe the computer system itself should be examined and updated, and they would like to see online request forms or at least be able to email an inventory report request instead of faxing it to the Branch. They suggest hiring more personnel and training them properly, and updating the Branch’s standard procedures – to include assigning specialists to areas of the database, correct discrepancies, and double-check information. Several IOIs suggest standardizing the database’s information. Many suggest a review of the database, and they would do inspections aimed at verifying the NFRTR data. Many would like

changes made to the report format because it is difficult to read. Many IOIs have positive comments, and many believe that the NFA Branch has improved in the past few years (roughly correlating with the move to West Virginia).

- **Responses for Q14 (not mutually exclusive)**
  - Out of 278 total responses:
    - 18 IOIs stated that they would like access to the NFRTR database for update or search purposes.
    - 5 IOIs stated that the search methods within the NFRTR should be changed (Specialists should be able to search more efficiently).
    - 19 IOIs stated that they would appreciate better communication from the NFA Branch, and 6 IOIs asked for better customer service.
    - 13 IOIs stated that the computer system could be improved.
    - 4 IOIs stated that some form of guidance should be distributed to the field offices or FFLs.
    - 10 IOI stated that the NFA Branch has improved, with 7 stating that they believe the improvement was a result of the move to West Virginia.
    - 75 IOIs had no response.
    - 26 IOIs commented on NFA personnel. 21 IOIs stated that the NFA Branch needed more personnel.
    - 18 IOIs stated that the reports needed improvement, especially in the format.
    - 3 IOIs asked to change the report request process.
    - 43 IOIs stated that a change in standard procedures was needed.
      - 8 IOIs asked to have specialists assigned to specific areas.
      - 5 IOIs asked to have errors corrected in the database.
      - 6 IOIs stated that the database information should be double-checked.
      - 2 IOIs stated that the database fields and information should be standardized.
    - 5 IOIs stated that NFA Branch needed more training.
    - 43 IOIs stated that updates were needed – to update or correct the database in a more timely fashion, and to reduce the time between receipt and approval by the NFA Branch. This includes updating transaction request data and removing out-of-date information.
  - Examples of positive comments
    - “I have always had excellent response to all requests for help. The problems seem to be from years past and are carried forward.”
    - “I feel that the NFRTR has improved greatly in the past couple years and are noticing that when you request something be amended, that it is getting amended.”
    - “They have always been very responsive.”
    - “The staff at the NFA Branch has always been professional and helpful. When additional information is required, forms are always faxed in a short period of time.”

- “The employees at the NFA branch have always been extremely helpful to me.”
- “The improvement of the NFA Branch under Mr. Ken Houchens is nothing short of phenomenal.”
- “No, I have noticed that, as a whole, the NFA Branch has improved significantly over the past months. Many of the FFL's have noticed this as well.”
- “NFA Branch greatly assists the work of the investigator in the compliance arena.”
- “In the past, there was no follow through by NFA Branch on recommended corrections. This seems to have changed in the last year.”
- “I think the NFA Branch does an excellent job of answering questions from the IOI's in the field as to which NFA forms are required and when they are submitted.”
- Examples of negative comments
  - “The same problems have existing since I have been with ATF, there have been numerous supervisor in the NFA Branch and the same problems are there.”
  - “I have none that anyone would find palatable!”
  - “I always have to close the inspection without ever knowing if the problems were resolved.”
  - “I've also had problems getting responses from NFRTR when I need information. Sometimes, I'll call and get someone, and they will respond to my request immediately. However, in recent incidents, I've had to leave voice mails, and even sent e-mails requesting additional information, never to receive responses. I was in the middle of coordinating a possible seizure of an unregistered NFA firearm, and could not obtain information from the NFRTR to assist me.”
  - “Update the computer program to a 21st century capability, one that can print in 12 font or larger, in a format that does not require six items to be printed on three pieces of paper. Having to fax search requests is so 1970's technology, and receiving 20 pages of blurred fax pages for 18 items is wasteful and inefficient. You are United States National Firearms Act Branch, stop operating like a third world country Dept of Motor Vehicles office.”
- Other Quotes
  - “It seems like there is a disconnect between those who approve transfers and those who make entries into the report records. There needs to be a system that automatically updates the records when a transfer is approved. There is no excuse for an error when a firearm a FFL lawfully transferred ten years ago is still listed to the FFL.”
  - “NFRTR inventory: An audit combined with an amnesty... An amnesty would have to be heavily advertised well in advance and run for a sufficient amount of time to allow people to be informed and submit registration documents. I believe it would be more effective in correcting records on firearms held by FFLs due to the better avenues of

communication such as open letters, FFL newsletters, and ATF website. I cannot suggest a method that would assure 100% contact with all individual owners or dealers.”

- “Maybe they could design a program on the ATF Website that would allow NFA weapon owners/dealers to update information more quickly.”
- “Often times an individual owning multiple NFA weapons will register some under his corporation, let's call it Company X. The same individual may register other firearms under his name, call him John Q. Doe. To be sure that one receives an exhaustive list of registered firearms one must query Company X, John Doe. If this is not done then one may have an incomplete list of firearms. Even if it is done, the NFRTR is so inaccurate that names can be misspelled.”
- “The National Firearms Act Brochure online at the ATF website, revised February of 2006, contains wonderful information that is not regularly and repetitively provided by sellers of NFA articles to purchasers of NFA articles. The questions answered by this brochure would solve many of the near-problems that are telephoned in to my office for answers or solutions. I SUGGEST MAILING A SUPPLY OF THESE BROCHURES TO EVERY PAYER OF CLASSES 1, 2, and 3 SOT. Maybe send a supply to gunsmiths, too.”
- “Having online access to the NFA inventory report is great! However, when errors or discrepancies are found and NFA Branch is contacted, they sometimes seem to have "additional" information about a firearm that is not in the system. This can make a big difference in the outcome of an inspection.”
- “Digital or regular photos of any item that is manufactured or is proposed to be transferred should be a required attachment with any application submitted to the NFA Branch.”

**The following are not part of the original documents, but are copied from inspectors' comments reflected in a spreadsheet also disclosed, which related to how do the errors affect compliance inspections:**

“The inaccuracies on the NFA print-outs make the field inspection more difficult and much more time consuming. .... I end up submitting a detailed report to the NFA Branch telling them what changes need to be made to their NFA report. Usually these changes are never made (by NFA) so the next investigator gets stuck re-verifying these same discrepancies during their next inspection.”

“Many times the FFL will state that they have reported the error or that the error came up in a previous compliance inspection and should have been corrected.”

“When I conduct an NFA inventory reconciliation, I start knowing that the NRA register will be incomplete or inaccurate.”

“Can usually work around them.”

“Going into an inspection knowing that almost certainly there will be discrepancies, affects your confidence level initially.”

“It create a problem in that the FFL becomes frustrated that our records are incorrect, thus making ATF look bad from the onset. Yet ATF expects perfection from FFLs.”

“The reliability of the NFRTR is so questionable that I spend additional time verifying all information and I am often forced to accept the FFL's answer.”

“The FFL records appear to be more accurate than the information contained within ATF's records.”

“The discrepancies in the NFRTR makes it impossible to verify the onsite inventory.”

“I encounter discrepancies on a daily basis.”

“In one instance, I received an NFRTR inventory report with more than 60 errors on behalf of the NFA branch.”

“It adds several hours to the inspection.”

“A majority of the FFLs I have inspected, NFA is a small portion of their business. However, I spend the most time on the NFA portion due to the NFRTR being inaccurate most of the time.”

“It creates embarrassment to the agency and the IOI because we are always wrong.”

“I basically have to depend more on the FFL's inventory records than on the NFA Branch.”