

June 27, 2018

The Honorable Jefferson B. Sessions, III  
Attorney General of the United States  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

Re: Bump-Stock-Type Devices; Notice of proposed rulemaking (ATF 2017R-22)

Dear Attorney General Sessions:

On behalf of the physician and medical student members of the American Medical Association (AMA), I write in strong support of the notice of proposed rulemaking on bump-stock-type devices issued by the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) in the Department of Justice (DOJ). The DOJ proposes to amend the ATF regulations to clarify that “bump fire” stocks, slide-fire devices, and devices with certain similar characteristics (bump-stock-type devices) are “machineguns” as defined by the National Firearms Act of 1934 (NFA) and the Gun Control Act of 1968 (GCA), because such devices allow a shooter of a semiautomatic firearm to initiate a continuous firing cycle with a single pull of the trigger. Under this clarification, possession or transfer of bump-stock-type devices would be unlawful. The AMA urges the DOJ to finalize this important proposed rule without delay.

Currently, bump stocks and other similar accessories that allow a regular, semi-automatic gun to accelerate its rate of fire to mimic a machine gun, are completely unregulated by the federal government. These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the GCA and the NFA by allowing an individual to modify a semi-automatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. While often marketed as a novelty item for recreational shooters, bump stocks and similar “conversion devices” that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety, as demonstrated by the horrific massacre in Las Vegas, Nevada last October. On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, killing 58 people and injuring over 800. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semi-automatic rifles with attached bump-stock-type devices. These devices were easily available through online sales directly from the manufacturer and through multiple retailers.

For more than two decades the AMA has recommended numerous policy solutions to address firearm safety. In 2016, the AMA declared gun violence a public health crisis that requires a comprehensive, public health-based approach. At the AMA’s Annual Meeting held earlier this month, which included delegates representing over 170 state and national medical specialty societies, the AMA adopted numerous additional policies and modified existing policy aimed at reducing gun violence and injuries and deaths related to such violence. One such policy relevant to the DOJ’s proposed rule on bump stocks is support for banning “the sale and ownership to the public of all assault-type weapons, bump stocks and

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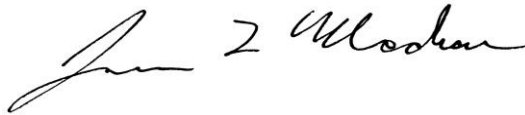
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related devices, high-capacity magazines, and armor piercing bullets.” Physicians see firsthand the carnage resulting from gun violence as well as the long-term consequences for individuals, their families, and their communities. Banning the possession or transfer of bump-stock-type devices would be a critical step forward in preventing future mass shootings such as the one in Las Vegas. The continued presence of these dangerous devices puts all of our communities at risk.

Accordingly, the AMA urges the DOJ to finalize this proposed rule with no changes. Thank you for the opportunity to comment on this important rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Madara". The signature is written in a cursive style with a large, sweeping initial "J".

James L. Madara, MD