



STONE BRAVO

OUTPOST LLC

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Stone Bravo Outpost LLC
Killeen, Texas

August 1, 2026

ATF Rulemaking Comments
Mail Stop 6N-518, Office of Regulatory Affairs
Enforcement Programs and Services
Bureau of Alcohol, Tobacco, Firearms, and Explosives
99 New York Ave. NE
Washington, DC 20226
ATTN: RIN 1140-AA94

Via electronic submission to the Federal eRulemaking Portal, <https://www.regulations.gov>

Re: Notice of Proposed Rulemaking
Firearms Electronic Record-Keeping
Docket No. ATF-2026-0002; ATF 2025R-07P
RIN 1140-AA94
Federal Register Document No. 2026-09158
91 Fed. Reg. 25,210 (May 8, 2026)
Comment period closes August 6, 2026

Greetings:

Stone Bravo Outpost LLC submits these comments on the above-captioned Notice of Proposed Rulemaking (the "Proposed Rule"). Stone Bravo Outpost LLC is a Texas limited liability company with an interest in the regulatory category addressed by the Proposed Rule.

I. Position

Stone Bravo Outpost LLC supports the Proposed Rule's authorization of federal firearms licensees to create, maintain, and store electronically "all records required under the Gun Control Act, as amended, the National Firearms Act, as amended, and their implementing regulations," proposed 27 C.F.R. § 478.130 — including the Firearms Transaction Record under § 478.124, the acquisition and disposition record under § 478.125, and records required under the National Firearms Act regulations at 27 C.F.R. part 479.

II. Condition on every request in this comment

Before stating any requested modification, the company states the limit that governs all of them.

Section 926(a) of title 18 provides that no such rule or regulation prescribed after the date of the enactment of the Firearms Owners' Protection Act "may require that records required to be maintained under this chapter or any portion of the contents of such records, be recorded at or transferred to a facility owned, managed, or controlled by the United States or any State or any political subdivision thereof, nor that any system of registration of firearms, firearms owners, or firearms transactions or dispositions be established." ATF cites the same section as the source of its authority for this rulemaking. 91 Fed. Reg. at 25,210.

Every request in this comment is conditioned on that bar, and the company asks that ATF read each of them subject to it. A published schema governs the *format* of records that licensees already keep, in the licensee's own possession, and creates no authority to collect, centralize, aggregate, or retain those records. Nothing requested here authorizes the transfer of records or of any portion of their contents to ATF or to any other government facility beyond what existing law already permits, and nothing requested here would establish, or supply a component of, any system of registration of firearms, firearm owners, or firearm transactions. A format standard determines what a record looks like when a licensee is already obliged to produce it; it does not determine whether, when, or to whom production may be compelled. If any request below were read to do more than that, the company withdraws it to the extent of the excess.

III. Requested modifications

The company requests three refinements to the Proposed Rule. Each advances the electronic record-keeping goals ATF identifies for this rulemaking — "easily accessing and reviewing required information; ensuring sufficient data integrity; and securely storing information over time to combat loss, theft, and accidental destruction—while providing more clarity and choice for the licensee." 91 Fed. Reg. at 25,211.

A. Published structured schema for electronic records

ATF should publish, and maintain on the ATF website, a structured machine-readable schema (for example, a JSON Schema document) defining the data elements required for an electronic Firearms Transaction Record under § 478.124 and an electronic Acquisition and Disposition Record under § 478.125. The Proposed Rule's authorization of electronic records should require that any electronic records system store records in a format that is convertible to that published schema upon ATF request.

A published schema:

1. permits FFLs to choose among recordkeeping software vendors without lock-in to a single proprietary format;
2. permits a transferee's own information, supplied by that transferee before arriving at the licensee's premises, to be entered into the licensee's record without being re-keyed by hand — the data is the buyer's own, furnished by the buyer, and no other source is contemplated; and
3. reduces a licensee's exposure to compliance findings that arise from format disputes and from inconsistent vendor implementations, and reduces the burden on a licensee of responding to a compliance inspection under § 478.23 and § 478.121(b), by fixing in advance what an acceptable electronic record looks like.

The Proposed Rule already supplies part of the mechanism. Proposed § 478.130(e)(2)(iii)(A) requires that back-up files be "openable and readable on devices other than any proprietary or specially designed licensee system," and proposed § 478.130(e)(2)(iii)(C) requires that they be "in a format specified by ATF in current guidance at the time." Proposed § 478.130(h)(4) requires a licensee ending operations to "[n]ot

submit electronic records in a non-commercial, proprietary file format." The company is precise about what those paragraphs reach: § 478.130(e)(2)(iii) governs the annual archival back-up written to a physical storage medium, and § 478.130(h)(4) governs records submitted to the National Tracing Center's Out-of-Business Records Center. Neither reaches the live electronic records system a licensee operates day to day.

The company addresses those paragraphs because they are where the Proposed Rule speaks to record formats, and not because it endorses the arrangements they describe. Centralized federal retention of a former licensee's records is contested, and nothing in this comment should be read as the company's endorsement of it. The submission itself is commanded by statute rather than by rule: records "would be submitted within 30 calendar days from the end of operations, as required by 18 U.S.C. 923(g)(4)." 91 Fed. Reg. at 25,212. What this rulemaking may settle is the form of that submission, and nothing beyond it. Any format standard applied to records submitted to the Out-of-Business Records Center must be confined to the form in which an already-required submission is made. It must not enlarge the categories of records ATF may hold, extend the period for which ATF may hold them, or make those records more susceptible to indexing, linking, or aggregation than the paper submissions they replace. A machine-readable format that made a centralized holding easier to search across licensees would convert a formatting measure into something the company does not ask for and would oppose.

The request therefore divides into two parts, and the company is explicit about which is which. First, publishing and maintaining the schema requires no new regulatory text: a published, versioned schema is the natural content of the "current guidance" that § 478.130(e)(2)(iii)(C) already contemplates, and ATF can commit to publishing one in the preamble to the final rule. That alone makes the archival and out-of-business formats concrete and testable at the time a licensee selects a system, rather than discoverable only later, and gives licensees and vendors one definition of what remaining readable outside a proprietary system requires. Second, extending the schema to the live records system does require new regulatory text, and the company asks for it: a paragraph added to proposed § 478.130(a) requiring that the records an electronic record-keeping system generates, maintains, or stores be convertible to the published schema on ATF request. The company states that plainly rather than presenting a new mandate as a clarification.

The second point above overlaps a companion rulemaking, and the company notes the overlap rather than duplicate an ask. ATF states that it "is concurrently publishing a proposed rule that proposes amendments to 27 CFR 478.124(c)(2) to permit persons and licensees to auto-populate information for the Form 4473, Firearms Transaction Record," and that those amendments "would also apply to all required licensee records." 91 Fed. Reg. at 25,211. Whether auto-population is permitted is a question for that rulemaking; the schema requested here governs only the format in which such data is structured and stored once permitted.

The third point responds to an obligation the Proposed Rule places on the licensee. Records must "be made available to ATF officers for compliance inspection or law enforcement purposes as required by the GCA, 18 U.S.C. 923(g)(1)(B)–(C)," and licensees "would have to be able to download or print the electronic records at their business premises" 91 Fed. Reg. at 25,212. That obligation exists whether or not a schema is published. What a published schema changes is the licensee's position in meeting it: the licensee can establish before purchasing a system that the system produces a conforming record, rather than learning at an inspection that a vendor's format is disputed. The company asks for the schema to make an existing duty answerable in advance, not to enlarge the occasions on which it is owed.

B. Schema licensing and versioning

The published schema should be released under terms permitting unrestricted use by FFLs and third-party software developers without license fee or vendor approval. The schema should carry an explicit version identifier, and ATF should commit to a documented backward-compatibility policy when amending the schema, so that existing FFL records remain valid under successor versions. Neither request requires new regulatory text: both govern how ATF publishes and maintains the schema, and both can be stated in the preamble to the final rule.

C. Security baseline for personally identifiable information

This rulemaking gives a commenter a named and specific instruction for protecting the commenter's own identifiers, while for the identifiers of the private individuals whose information licensees are required to record it states a duty whose content it leaves undefined. A commenter who wishes to submit personally identifying information is directed to place it in a separate attachment or on a cover sheet and "mark it at the top with the marking 'CUI//PRVCY,'" a marking used "to identify it as protected PII under the Privacy Act." 91 Fed. Reg. at 25,210, 25,214. That instruction governs a commenter's own information in a submitted comment, and the marking is applied by the commenter; it is not ATF designating licensee transaction records as controlled unclassified information. The company draws no more from it than this: the categories of identifier ATF asks a commenter to segregate and mark are the same categories a Firearms Transaction Record collects, in smaller quantity and about a person who chose to write to the agency. A Form 4473 collects them in greater volume, about a person who had no choice but to supply them in order to complete a lawful purchase, and holds them for years. For those identifiers the Proposed Rule names no marking, no control, and no standard — it states only the unspecified duty of secure storage in proposed § 478.130(d), addressed below. That asymmetry is the reason for the request in this Part.

Firearm transaction records contain identifiers — name, address, date of birth, and identification document numbers — that fall squarely within the definition the Executive Branch applies to itself. OMB Circular No. A-130 defines the term as follows:

"'Personally identifiable information' means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual."

OMB Circular No. A-130, *Managing Information as a Strategic Resource* § 10(a)(57), at 33 (July 28, 2016); see Revision of OMB Circular No. A-130, 81 Fed. Reg. 49,689 (July 28, 2016).

The identifiers a Firearms Transaction Record collects are of exactly that character. Each is collected for the purpose of distinguishing and tracing the identity of a specific individual, and in combination they do so with precision.

The company therefore requests the following. Proposed § 478.130(d) provides that "[l]icensees must store their electronic records securely to prevent data loss and breaches for the same records retention period as paper records," but does not say what secure storage requires. The final rule should give that paragraph content by requiring that electronic records containing personally identifiable information be protected by encryption at rest and in transit consistent with the baseline controls in NIST Special Publication 800-171, Revision 3, *Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations* (May 2024). This request does require new regulatory text — a sentence added to proposed

§ 478.130(d) — and the company asks for it as such. ATF's own goal of "securely storing information over time to combat loss, theft, and accidental destruction" supports stating a baseline rather than leaving the standard of protection to each vendor, and the purchaser whose identifiers are held has no way to select among vendors or to inspect the choice the licensee made.

The company is precise about what that publication is. By its own terms it "provides federal agencies with recommended security requirements for protecting the confidentiality of CUI when the information is resident in nonfederal systems and organizations," and those requirements are "intended for use by federal agencies in contractual vehicles or other agreements established between those agencies and nonfederal organizations." NIST SP 800-171r3, Abstract, at i. It is therefore not a general privacy standard, and it does not reach these records of its own force: they are not controlled unclassified information, ATF is not designating them as such, the company does not ask ATF to designate them, and there is no contract between ATF and a licensee into which the publication could be incorporated. The company offers it as a model, not as a governing baseline. What recommends it as the model is that it was written for the same structural problem presented here — confidentiality of information the Federal Government requires to be held on systems the Government neither owns nor operates. The records at issue are the licensee's own business records, which federal law requires the licensee to create and keep, held in the licensee's own possession, and containing the personal information of private individuals. The specific controls the company asks ATF to reference are the publication's requirements for transmission and storage confidentiality and for cryptographic protection, and those controls turn on the state of the information rather than on the category that made it controlled unclassified information in the first place. Naming an existing, maintained standard lets ATF state a floor for the protection of that information without authoring a new security standard of its own, and leaves that standard to be kept current by the body that maintains it.

IV. Costs

The Office of Management and Budget "has determined that this proposed rule would not be a 'significant regulatory action' under Executive Order 12866 as it would not impose any costs or savings." 91 Fed. Reg. at 25,212. ATF further states that it "would not create any new information collection requirements, or impact any existing ones, covered by the PRA," the Director certifies that it "would not have a significant economic impact on a substantial number of small entities," and ATF expects the rule, if finalized as proposed, "to qualify as an Executive Order 14192 deregulatory action." *Id.* at 25,213. ATF "requests comments on the costs or benefits of the proposed rule and on the appropriate methodology and data for calculating those costs and benefits." *Id.* The company does not dispute those determinations as to the Proposed Rule as written, and addresses the cost of the two requests above that would add regulatory text.

Schema convertibility. This cost falls on software vendors rather than on licensees, and it is a one-time implementation cost: a vendor writes one export routine against a published schema and ships it to every customer it serves, after which the marginal cost per licensee is zero. It is smaller than the cost it displaces, which is each vendor and each licensee resolving format questions with ATF case by case, and smaller still than the cost of a licensee discovering at inspection or at closure that its records cannot be produced in an acceptable format. The company does not claim the cost is zero, and notes that a requirement imposing costs greater than zero bears on how the final rule is characterized under Executive Order 14192.

Encryption at rest and in transit. Encryption at rest and in transit is a standard feature of commercial recordkeeping and database products rather than a custom build, consistent with ATF's observation that "licensees are able to meet the requirements with inexpensive versions of existing modifiable software." 91 Fed. Reg. at 25,213. For a licensee whose system already provides it — which the company expects to be the ordinary case — the incremental cost of the requirement is the cost of confirming a setting. Where a system does not provide it, the cost is a vendor upgrade or a change of vendor. The company does not claim that cost is zero, and does not represent that ATF has accounted for it: ATF states that the Proposed Rule would impose no costs at all, and its one acknowledgment that "some of the anticipated cost savings may be offset should a licensee need to purchase a new electronic records system" quantifies nothing and is made about electronic record-keeping as the Proposed Rule offers it, which ATF describes as "purely optional." *Id.* The requirement the company asks for would not be optional, and its cost bears on how the final rule is characterized under Executive Order 14192 for the same reason stated above.

Neither request creates a new information collection: both govern the format and protection of records licensees already keep, not any new reporting to ATF.

V. Conclusion

Stone Bravo Outpost LLC supports finalization of the Proposed Rule with the modifications in Part III, subject in every respect to the condition stated in Part II.

Respectfully submitted,

/s/ Warren Stone

Warren Stone
Founder, Stone Bravo Outpost LLC

