



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

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Martinsburg, WV  
25405  
www.atf.gov

AUG 27 2018

907010:GSS  
3311/309436

Mr. Michael Faucette  
Mark Barnes & Associates  
1350 I Street NW, Suite 260  
Washington, DC 20005

Dear Mr. Faucette:

This is in response to your correspondence to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB), and one accompanying sample submitted on behalf of your client LMP/ Mail Order Video, Inc., also known as "Glockstore." The submitted sample is a model SS80, polymer pistol frame-blank manufactured by Glockstore. Specifically, you request an evaluation and classification of the SS80 polymer pistol frame-blank with respect to the Gun Control Act of 1968 (GCA).

You submitted this sample in response to the FTISB's request found in letter 308007, dated February 13, 2018, in which FTISB identified that the product submitted by Glockstore was only one component of a larger product known as the "SS80 80% Lower" kit.

In your current correspondence, you state, that the SS80 polymer pistol frame-blank will be marketed and sold as a separate, standalone product, and will not be part of a kit. You request that we omit the fixture, drill bits, front rail-piece, and rear rail-piece previously submitted in the SS80, 80% Lower kit from our evaluation of the current submission.

As background, the GCA, 18 U.S.C. § 921(a)(3), defines the term "**firearm**" as "*(A) any weapon (including a starter gun) which will or is designed to or may be readily converted to expel a projectile by the action of an explosive...[and]...(B) the frame or receiver of any such weapon....*"

Mr. Michael Faucette

Also, the GCA, 18 U.S.C. § 921(a)(29), defines the term “handgun” as “(A) a firearm which has a short stock and is designed to be held and fired by the use of a single hand; and (B) any combination of parts from which a firearm described in subparagraph (A) can be assembled.”

Also, 27 CFR § 478.11 defines “firearm frame or receiver” as “...that part of a firearm which provides housing for the hammer, bolt or breechblock, and firing mechanism, and which is usually threaded at its forward portion to receive the barrel.”

Based on product research, the submitted sample appears to be marketed by your client as a standalone product. However, as of August 14, 2018, references to the previously submitted kit remain on the Glockstore website, indicating the company may still be marketing the entire kit.

Now is your best time to purchase the SS80 lower.

Federal law states that you can build a firearm for personal use. This law has been in effect for years, but one knows when, or if, it will be changed or repealed.

This do-it-yourself kit accepts Glock 43 factory parts.

The SS80 is the best lower kit available. In fact, at this time, it is the only 80% lower available that accept G43 parts. It is a very high quality polymer frame.

There are a lot of reasons to purchase an 80% lower. We are here to support your choice with the information and parts you need to make it a reality.

Clip from the additional information section of the “SS80 80% Lower-preorder” product description obtained from [www.glockstore.com](http://www.glockstore.com)

SKU: SS80 80% LOWER - PRE ORDER

SS80 80% LOWER - PRE-ORDER  
\$129.99 ~~\$169.00~~

No Reviews yet

SKU: 1500-BLK  
SELECT COLOR: BLACK

QTY: 1

ADD TO CART ADD TO WISHLIST

PRODUCT DESCRIPTION

Image of the Glockstore “SS80 80% Lower-preorder” product obtained from [www.glockstore.com](http://www.glockstore.com)

Mr. Michael Faucette



**Submitted Sample**

The submitted polymer grip module is similar in design to a Glock subcompact slim-line pistol frame. However, this grip module differs from the traditional Glock frame because it does not incorporate the metal pieces necessary to assemble a complete weapon. The submitted blank is completed to the point where it will receive the following Glock components:

- Trigger with trigger bar;
- Trigger mechanism housing assembly;
- Slide stop lever assembly;
- Slide lock assembly;
- Magazine catch assembly; and
- The locking block.

However, the submitted grip housing lacks or requires additional work to complete the following features:

- Devoid of slide rails;
- Requires trigger pin-hole to be drilled;
- Requires trigger-housing pin-hole to be drilled; and
- A polymer blocking feature needs to be removed from the forward end of the grip-housing in order to allow installation of a Glock slide assembly.

Because the submitted sample is of objectively different design than a traditional Glock frame, it is not necessarily the case that this outer polymer piece is the “frame” of a complete weapon

Mr. Michael Faucette

using the submitted piece. Although the submitted sample may be only a firearm part, the FTISB evaluation has determined that the submitted sample, as received, does not possess the critical features which would constitute classification of the sample as a *firearm* even if it was determined to be the firearm frame of a weapon.

ATF has not yet determined which component of the SS80 design constitutes the "frame" of the complete weapon. If the polymer grip housing is determined to be the frame of the SS80 *firearm* design, any *frame-casting* or *frame-blank* that has been manufactured or otherwise finished to the point represented by the submitted sample would not be classified as a *firearm* as defined in the GCA.

Accordingly, FTISB finds that the submitted SS80 polymer frame-blank, in and of itself, is not regulated as a *firearm* under the GCA.


This classification applies only to the polymer frame-blank as a standalone product. This classification does not apply if the polymer frame-blank is marketed, sold, or distributed as part of a kit.

We caution that these findings are based on the sample as submitted. If the design, dimensions, configuration, method of operation, or materials used were changed, our determination would be subject to review.

We thank you for your inquiry, along with the submitted sample, and trust the foregoing has been responsive to your request.

Sincerely yours,

*MR*



Michael R. Curtis

Chief, Firearms Technology Industry Services Branch