

October 17, 2003

Bureau of Alcohol, Tobacco, Firearms and Explosives
Office of Public and Governmental Affairs
650 Massachusetts Avenue, NW.
Room 8290
Washington, DC 20226

Dear Sir/Madam,

I am writing to you to inquire about the legality of some replacement parts for a Walther P22 and P99. The parts in question constitute the “frame” and “side-plate” of the P22. Also, the “complete frame” of the P99.

My understanding of *The Gun Control Act of 1968, Public Law 90-618 § 921. Definitions:*

(3) The term "firearm" means (A) any weapon (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive; (B) the frame or receiver of any such weapon; © any firearm muffler or firearm silencer; or (D) any destructive device. Such term does not include an antique firearm.

is that the frame of a handgun is the part considered to be the “firearm”. However, as you can see on the photos enclosed, for the P22, the “grip/frame” appears to consist of two distinct parts: the polymer/plastic “grip” and the metal “side-plate”. I would like you to tell me if BOTH parts are considered the “firearm” or just the “side-plate”. Is the polymer/plastic “grip/frame” legal to purchase without going through a FFL and completing a 4473 form? Is the “side-plate” legal to purchase without going through a FFL and completing a 4473 form? The “side-plate” is the part that gets the serial number stamped on it.

As for the P99 “complete frame”, I would surmise that this is definitely considered the “firearm” but would still like your confirmation on that fact.

Best regards.

Sincerely,

James Lenaburg
Enclosures: P22 parts pictures, P99 parts pictures