



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

MAR 10 2004

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www.atf.gov

Mr. James Lenaburg

Dear Mr. Lenaburg:


This refers to your letter of October 17, 2003, to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Branch, in which you inquire about the classification of certain Walther P22 and P99 pistol components.

For your information, the Walther P22, .22 caliber semiautomatic pistol incorporates a zinc alloy frame seated within the polymer trigger housing. The serial number is visible through an oval window on the right side of the trigger housing. The alloy frame is the component of this pistol that constitutes a "firearm" as defined in the Gun Control Act of 1968 (GCA), 18 U.S.C. § 921(a)(3). The polymer trigger housing does not constitute a "firearm" as defined.

The Walther P99 series pistols incorporate a glass fiber-reinforced polymer frame. The serial number is found on a metal plate imbedded into the frame forward of the trigger guard. This polymer frame constitutes a "firearm" as defined in the GCA. If available, the frames of these pistols may be purchased from a Federal Firearms Licensee (FFL). An ATF Form 4473 must be completed at FFL premises in order to obtain the frames.

We thank you for your inquiry and trust the foregoing has been responsive.

Sincerely yours,

*For*   
Sterling Nixon  
Chief, Firearms Technology Branch