



CITY OF NEW HAVEN
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U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms, and Explosives
Office of Regulatory Affairs, Enforcement Programs and Services
Attn: Andrew Lange
99 New York Ave. NE, Mail Stop 6N-518
Washington, DC 20226

Re: Definition of “Frame of Receiver” and Identification of Firearms (Docket No. ATF 2021R-05)

Ladies and Gentlemen,

I welcome the opportunity to comment on the notice of proposed rulemaking issued by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) entitled *Definition of “Frame or Receiver” and Identification of Firearms*. As the Mayor of New Haven, Connecticut, a city that continues to be impacted by gun violence, gun safety is a matter of personal importance for me. I find the increasing prevalence of ghost guns deeply concerning, as it poses a threat to the public safety of New Haven and the rest of the United States.

I strongly support the proposed rule, and encourage ATF to finalize it without delay. Because ghost guns are untraceable and require no background check to purchase, they form a significant and dangerous loophole in common-sense gun laws that require guns to have traceable serial numbers and potential gun owners to be vetted. This loophole makes it too easy for those who are not legally able to

possess firearms to obtain them. More and more, ghost guns are being recovered at the scene of violent crimes in Connecticut and across the United States. This proposed rule is crucial in closing this loophole and stemming the proliferation of untraceable guns without background checks to those who will use them to commit violent crimes.

While ghost guns have been illegal in Connecticut since 2019, they are still a dangerous problem for our state and for the City of New Haven. State laws can only go so far while dangerous loopholes like this one still remain on a federal level; despite Connecticut's law, the New Haven Police Department has already recovered three ghost guns so far this year. Just south of us in Stratford, Connecticut, a ghost gun was used in a drive-by shooting by group of teenagers in May. This shooting—unfortunately just one of multiple such incidents to happen so far this year—demonstrates the ease with which ghost guns end up in the hands of youth and others who should not possess firearms. Ghost guns make it that much easier for young people to become involved in violent crime, leading to patterns of violence that only get worse with time. Without federal rules that correctly define ghost guns as the type of “frame or receiver” included in firearm sales regulations, it remains altogether too easy for youths, criminals, gun traffickers, and others who are legally banned from owning guns to obtain them.

As New Haven—like many other cities across the United States—faces a recent, dramatic rise in gun violence, it is imperative that we do everything in our power to protect the safety and wellbeing of our residents. Simply put, the cost of inaction is too high—in lives lost to gun violence, in pain and trauma of those impacted by it, in resources expended to fight it, and in the lost potential of those who become involved with it. But reducing gun violence is not a simple or easy thing to accomplish. We must address the issue from many different directions, from the lack of opportunity that makes some turn towards violent crime, to the prevalence of guns, which make it that much easier for them to do so. Making sure that guns do not fall into the hands of youths and people who will use them to commit violence is a crucial priority in fighting gun violence, and this proposed ATF rule is a vital, urgent first step towards ensuring that that happens.

I believe that the proposed rule is necessary to stop the dangerous proliferation of ghost guns and to protect the public safety of New Haven, as well as cities and communities across the United States. I strongly recommend that ATF finalize the proposed rule without delay.

Sincerely,

Justin Elicker

Mayor, New Haven, CT