

OMB No. 1512 - 0025 (05/31/2004)
 FILE TO:
 NATIONAL FIREARMS ACT BRANCH
 BUREAU OF ATF
 WASHINGTON, DC 20226

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
NOTICE OF FIREARMS MANUFACTURED OR IMPORTED
(Complete in duplicate - See Instructions)

The undersigned hereby serves notice of the manufacture, reactivation, or importation of firearms as required by § 5841 of the National Firearms Act, Title 26, U.S.C. Chapter 53.

2. NAME AND ADDRESS (Include trade name, if any)

HISTORIC AFIMC LLC
 1486 CHERRY RD.
 FRANKLIN, GA 30217

SOLE PROPRIETOR PARTNERSHIP CORPORATION

8. DESCRIPTION OF FIREARM(S)
 TYPE OF FIREARM (See instruction 1c)
 ADDITIONAL DESCRIPTION (See instruction 3e)

Machine gun
 (to be removed from registry pending re-evaluation by ATF)
 Post Dealer Sample

3. FEDERAL FIREARMS LICENSE NUMBER
 1-58-149-07-5G-01270

4. EMPLOYER IDENTIFICATION NUMBER AND CLASS
 16-1633863

5. NUMBER OF FIREARMS COVERED BY THIS NOTICE
 1

6. TELEPHONE NUMBER (include area code)
 706-675-0818
 7. DATE OF MANUFACTURE, REACTIVATION OR RELEASE FROM CUSTOMS
 Jan 4 05 (FTB classification)

MODEL
 38M8-5cm.

LENGTH (in.)
 BARREL OVERALL
 Approx. 30"
 Overall approx. 48"

SERIAL NUMBER (See instruction 3d)
 MK4

PERMIT NUMBER

EXPIRATION DATE

1. TYPE OF NOTICE
 FIREARMS ON THIS NOTICE ARE: (Check one)
 MANUFACTURED
 REACTIVATED
 IMPORTED (complete b & c)

9. SIGNATURE OF MANUFACTURER OR IMPORTER (or authorized official)
 Len Savage
 President, Historic Arms LLC
 11. FILING DATE
 1-11-05

10. NAME AND TITLE OF AUTHORIZED OFFICIAL
 Len Savage
 President, Historic Arms LLC

UNDER PENALTIES OF PERJURY, I DECLARE that I have examined this notice of firearms manufactured, reactivated or imported and to the best of my knowledge and belief, it is true, correct and complete.

ATF USE - RESTRICTIONS (if any)
 IMPORTED UNDER 26 U.S.C. § 5844 FOR USE (A) BY A GOVERNMENT AGENCY, (2) FOR SCIENTIFIC OR RESEARCH PURPOSES, OR (3) AS A MODEL OR SALES SAMPLE. (NOTE: machineguns are not subject to these restrictions.)
 MACHINEGUN MANUFACTURED OR IMPORTED AFTER MAY 19, 1986 (18 U.S.C. § 922(o))

NFA CONTROL NUMBER
 RECEIPT DATE

ATF F 2 (5320-2) (6-2001) PREVIOUS EDITIONS ARE OBSOLETE



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

OCT 24 2003

903050:AVH
3311/2003-375

Mr. Lennis F. Savage III
Historic Arms, LLC
1486 Cherry Road
Franklin, Georgia 30217

Dear Mr. Savage:

This is a revised reply to your letter of April 28, 2003, regarding a semiautomatic version of a Russian RPD-type machinegun submitted for examination. This is your second submission of the subject firearm, with alterations reflecting the results of the previous examination conducted by this office. The submitted firearm is identified as a Model RPD-SA, serial number X02.

Examination of the resubmitted firearm has disclosed the following:

The receiver of the submitted weapon appears to be newly manufactured from solid metal and is incapable of accepting RPD-type machinegun components.

The submitted firearm is belt fed.

The bolt carrier has a modified piston post that is permanently installed. This piston post is slotted to accommodate the firing pin movement as the bolt cams backward and the locking lugs protrude outward.

The submitted firearm fires from the closed bolt position using a spring-loaded firing pin approximately 4-1/2 inches long that projects beyond the rear face of the bolt, allowing contact with the striker. The hammer portion and sear surface have been removed from the operating slide. A separate sliding striker is incorporated, moving on the recoil

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Mr. Lennis F. Savage III

spring push rod, and during a firing cycle, being retained by the sear as the bolt moves forward to chamber a cartridge.

Test firing on July 7, 2003, using both Russian military and commercial 7.62x39mm caliber ammunition, indicated that the piston assembly and bolt carrier functioned as designed, preventing the firearm from functioning in the automatic mode. Test firing the firearm in the condition received resulted in the firearm functioning in the semiautomatic mode only.

Based on the results from the test firing of the Historic Arms LLC semiautomatic RPD-type firearm, Model RPD-SA, serial number X02, the firearm is classified as a "firearm" as defined in the Gun Control Act of 1968, Title 18, U.S.C., Chapter 44, Section 921(a)(3). A firearm manufactured in this configuration would not be a "machinegun" as defined in Title 26, U.S.C., Chapter 53, Section 5845(b), of the National Firearms Act (NFA) and would not be subject to NFA provisions.

Further, in the configuration received, it would not be a "semiautomatic assault weapon" as defined in 18 U.S.C. Section 921(a)(30). Utilizing only 10 of the imported parts listed in 27 CFR, Part 178, Section 178.39, the firearm would not be assembled in violation of 18 U.S.C. Section 922(r).

The above classification applies to the firearm as received and produced as described above. Any alterations to this configuration could result in this classification being subject to review.

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

Sincerely yours,



Sterling Nixon

Chief, Firearms Technology Branch

FROM : VECTOR INC. (801)295-5316

PHONE NO. : 8012955316

Jun. 03 2004 10:39AM ET



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

DEC 10 2003

Washington, DC 20226

www.atf.gov

903050:RDC
3311/2004-078

Mr. Ralph Merrill
President
Vector Arms, Incorporated
270 West 500 North
North Salt Lake, Utah 84054

Dear Mr. Merrill:

This refers to your prototype closed-bolt, firing, semiautomatic copy of the Russian RPD light machinegun that was received by the Firearms Technology Branch, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), on October 30, 2003, for the purposes of examination and classification.

The submitted sample resembles a Russian, RPD-type machinegun and contains certain original RPD components. These include the barrel assembly, feed mechanism, forearm, cocking handle, pistol grip, and buttstock.

As you are aware, the National Firearms Act (NFA), 26 U.S.C. § 5845(b), defines the term "machinegun" to include the following

...any weapon that shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. This term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.

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Mr. Ralph Merrill.

Our examination has found that the receiver has been manufactured from an original receiver section and a newly manufactured receiver section. The forward half of the receiver, approximately 6-1/2 inches long, was taken from an original RPD machinegun. The rear section, approximately 6-1/2 inches long, has been newly manufactured. These sections have been welded together. You indicate that the production semiautomatic receivers will be entirely manufactured by your firm and not from mated receiver sections.

Also, we found that, internally, the prototype receiver differs from an original RPD receiver. The slots in the bottom of the receiver are approximately 1/4 inch shorter than the corresponding slots in an RPD receiver. This prevents the installation of a functional machinegun trigger group/buttstock assembly. Further, the bolt carrier track slot on the interior right wall has an additional rib running the full length of the new section. The takedown crosspin hole in the rear of the receiver has been enlarged to inhibit the use of an original crosspin.

With regard to the trigger housing, we found that the slot within it has been elongated to accommodate a newly designed trigger/sear/disconnector assembly. Fitted within the rear of the housing is a spring-actuated hammer assembly. This assembly consists of a hammer block, slotted outer tube, coil spring, and tubular guide rod.

Our examination noted that the original bolt carrier has been redesigned. The sear catch on the underside has been machined away. A slot has been machined throughout the length of the right rail. This slot mates with the rib within the rail slot of the receiver. The original hammer surface has been removed from the raised rear area. This section has further been machined, and a sliding hammer extension installed. This extension delivers the inertia from

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Mr. Ralph Merrill

the semiautomatic hammer to the rear of the firing pin within the bolt. The firing pin has been shortened to approximately 2.925 inches in length.

Based on our assessment, we recommend incorporation of the following changes in the design of the receiver and bolt carrier:

- The shortening by 1-inch, forward end, of the bolt-carrier track slots on the interior receiver walls.
- The extension of the center rib on the right interior slot to the full length of the remainder of the track slot.
- The shortening by 1 inch of the rails on the sides of the bolt carrier.

With respect to the domestic production of parts, you indicate that the following components will be manufactured in the United States:

- frame/receiver;
- trigger;
- hammer;
- sear;
- disconnecter; and
- buttstock.

Also, you indicate that the following components will be imported:

- barrel;
- bolt;
- bolt carrier;
- operating rod;
- gas piston;

M : VECTOR INC. (801)295-9316

PHONE NO. : 8012959316

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Mr. Ralph Merrill

- trigger housing;
- pistol grip;
- forearm; and
- magazine body.

Not applicable to this type of firearm are the following components:

- trunion block;
- muzzle attachment;
- magazine follower;
- magazine floorplate.

A magazine drum body accompanied the submitted firearm. Found within the drum was an ammunition link belt assembly consisting of 50 individual links.

The submitted prototype, incorporating our suggested receiver and bolt-carrier modifications, would be a weapon designed to fire from the closed-bolt position in the semiautomatic mode. It would not constitute a "machinegun" as defined within the NFA. It remains a "firearm" as defined in 18 U.S.C. 921(a)(3). Assembly of this firearm, using the parts as described above, would not be in violation of 18 U.S.C. 922(r).

Markings on the receiver include "00001", "RPD-SA", "CAL. 7.62 x 39", and "VECTOR ARMS NSL-UT". Federal regulations, specifically 27 CFR 478.92, state the following with respect to markings:

Each licensed manufacturer or licensed importer of any firearm manufactured or imported shall legibly identify each such firearm by engraving, casting, stamping (impressing), or otherwise conspicuously placing or causing to be engraved, cast, stamped (impressed) or placed on the frame or receiver thereof in a manner not susceptible of being readily obliterated, altered, or removed, an individual serial number not duplicating any serial number placed by the manufacturer or importer on any other firearm, and by engraving, casting, stamping (impressing), or otherwise conspicuously placing or causing to be engraved,

A: VECTOR INC. (801)295-9316

PHONE NO. : 8012959316

Jun. 09 2004 10:47AM PS

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Mr. Ralph Merrill

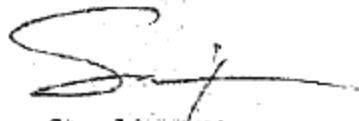
cast, stamped (impressed), or placed on the frame or receiver, or barrel thereof in a manner of not susceptible of being readily obliterated, altered or removed, the model, if such designation has been made; the caliber or gauge; the name (or recognized abbreviation of same) of the manufacturer and also, when applicable, of the importer; in the case of a domestically made firearm, the city and State (or recognized abbreviation thereof) wherein the licensed manufacturer maintains its place of business; and in the case of an imported firearm, the name of the country in which manufactured and the city and State (or recognized abbreviation thereof) of the importer...

Please note that for firearms manufactured or imported on and after January 30, 2002, the engraving, casting, or stamping (impressing) of the serial number must be to a minimum depth of .003 of an inch and a minimum height of 1/16 of an inch. All other markings must be of a minimum depth of .003 of an inch.

Based upon our assessment and review of applicable Federal statutes and regulations, we have determined that the submitted link assembly constitutes a "large capacity ammunition feeding device" as defined in 18 U.S.C. 921(a)(31). Manufacture of such devices after September 14, 1994, is restricted for law enforcement or for Government use. Possession of such devices manufactured prior to that date is unrestricted.

We thank you for your inquiry and submitted prototype and trust that the foregoing review has been responsive to your request for an evaluation.

Sincerely yours,



Sterling Nixon
Chief, Firearms Technology Branch



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

NOV 13 2003

903050:AVH
3311/2003-507

Mr. Lennis F. Savage III
Historic Arms, LLC
1486 Cherry Road
Franklin, Georgia 30217

Dear Mr. Savage:

This is in reply to your letter of May 19, 2003, and submitted sample of the BM-3000 prototype upper receiver. This prototype is based on the Historic Arms Model RPD-SA semiautomatic rifle and is designed for potential use with registered M-11 type machineguns.

The submitted sample resembles a Russian RPD-type machinegun and contains certain RPD components including the barrel, feed mechanism, forearm, bipod, and modified buttstock assembly.

Based on an examination of the submitted firearm and the information you have provided, we note that the receiver has been assembled using sections of a previously destroyed RPD machinegun receiver. You state that you are developing a CNC-manufactured receiver that would be produced from solid metal.

The submitted sample also incorporates an open bolt firing mechanism. Additionally, the receiver has been remanufactured to such dimensions that it is no longer capable of accepting an RPD machinegun type of trigger housing. It is designed to be installed on an M-11 type machinegun frame or receiver.

As defined in 26 U.S.C. Section 5845(b) of the National Firearms Act (NFA), the term "machinegun" means "any weapon which shoots, is designed to shoot, or can be readily restored to shoot automatically more

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Mr. Lennis F. Savage III

than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed from which a machinegun can be assembled if such parts are in possession or under the control of a person."

The phrase, "shoots automatically," covers weapons that will function automatically. The "readily restorable" phrase defines weapons which previously could shoot automatically but will not shoot in their present condition. By employing the word, "designed," the definition includes weapons which have not previously functioned as machineguns but possess specific machinegun design features which facilitate automatic fire by simple alteration or elimination of existing component parts.

Due to its design and construction, we find that the BM-3000 as provided, in and of itself, incorporates the frame or receiver of a machinegun and, therefore, is a "machinegun" as defined in Section 5845(b) of the NFA. The fact that it uses an M-11 machinegun as a trigger housing does not preclude classification of the upper receiver as a receiver.

Finally, the sample is subject to all the provisions of the NFA, and it is subject to 18 U.S.C. Section 922(o).

Since the submitted sample has been determined to be a machinegun, and is not registered in accordance with the provisions of the NFA, we are unable to return it until you complete an ATF Form 2, Notice Of Firearms Manufactured Or Imported. Please provide this office with instructions concerning disposition of the item within 60 days, or it will be considered abandoned and will be disposed of in accordance with the needs of the Government.

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Mr. Lennis F. Savage III

We thank you for your inquiry and regret that the foregoing assessment could not have been more favorable.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "John Nixon".

Sterling Nixon
Chief, Firearms Technology Branch