



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

MAR 17 2006

www.atf.gov

903050:RDC

3311/2006-498

Dear Mr. _____ :

This refers to your letter of February 20, 2006, to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) regarding the legality of making superficial alterations to a Russian Izhmash "Tigr" 7.62x54mm semiautomatic rifle. Your correspondence was forwarded to ATF's Firearms Technology Branch (FTB), Martinsburg, West Virginia, for reply.

As background to your inquiry, 18 U.S.C. § 922(r) states—

...it shall be unlawful for any person to assemble from imported parts any semiautomatic rifle or any shotgun which is identical to any rifle or shotgun prohibited from importation under section 925(d)(3) of this chapter as not being particularly suitable for or readily adaptable to sporting purposes except that this subsection shall not apply to —

- (1) the assembly of any such rifle or shotgun for sale or distribution by a licensed manufacturer to the United States or any department or agency thereof or to any State or any department, agency, or political subdivision thereof; or*
- (2) the assembly of any such rifle or shotgun for the purposes of testing or experimentation authorized by the Attorney General.*

In your letter, you ask about making three specific alterations to the Russian "Tigr" rifle including:

- Removing the original "Tigr" muzzle device and attaching a Russian-manufactured Dragunov SVD-type combination front sight and flash suppressor or flash hider;
- Removing the original "Tigr" thumbhole stock and replacing it with a Russian manufactured Dragunov SVD type stock; and
- Using a Russian manufactured Dragunov SVD-type 10-round magazine.

Mr.

As you are aware, a semiautomatic variation of the Russian Dragunov SVD featuring the component parts you propose to use with the "Tigr" rifle has been approved for importation into the United States. Since the imported Dragunov SVD has been recognized as particularly suitable for sporting purposes, exchanging the component parts on another otherwise importable rifle would not be unlawful.

Accordingly, you may exchange the aforementioned component parts of the imported "Tigr" rifle for those of the imported Dragunov SVD rifle and not be in violation of § 922(r).

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

Sincerely yours,

A handwritten signature in black ink, appearing to read "S. Nixon", with a stylized flourish extending to the right.

Sterling Nixon
Chief, Firearms Technology Branch