American Arms, Delta
105 N. Edison Way #8
Reno, Nevada 89502

Gentlemen:

This refers to the semiautomatic firearm that was resubmitted for classification. The weapon was received on April 30, 1997,

Examination of the submitted sample, serial number A70178, indicates that it is a semiautomatic rifle based on the M60 machinegun design. The receiver has been assembled using a remanufactured M60 machinegun trunion, a M60 machinegun right side rail, left side rail and rear bridge. A newly manufactured lower channel has been attached to the trunion and side rails by means of 12 rivets. The lower channel has no opening for the M60 machinegun sear and a plate approximately 13 inches in length has been installed in the bottom of the channel by means of six rivets. The purpose of the above plate is to prevent the installation of a standard M60 machinegun operating rod.

The above receiver construction has previously been approved provided that the forward two rivets attaching the lower channel to each side of the trunion are welded in place and the lower channel is welded to the trunion by means of seam welds on each side and the bottom of the channel in the area where the channel meets the trunion. Additionally, four of the rivets which attach the plate to the inside bottom of the lower channel must be welded in place.

The forward pistol grip mounting point on the trunion has been eliminated and relocated approximately ¼ inch to the rear of the original position. The rear pistol grip mounting slot has also been moved approximately ¼ inch rearward.
A standard M60 machinegun sear has been modified by removing the engagement surface. A spring loaded, pivoting, trigger bar has been attached to the left rear of the modified sear. This trigger bar passes upward through a hole in the lower channel and corresponding slots cut in the left side of the bottom plate and left rail. This trigger bar engages a spring loaded sear located in the rear of the bolt.

The firearm has been redesigned to fire from the closed bolt by means of a spring loaded striker. This striker is mounted in a rectangular housing containing a spring loaded sear. The housing screws into the rear of an M60 machinegun bolt. The firing mechanism is designed such that when the trigger is pulled the trigger bar depresses the sear, thus releasing the striker to fire. When the sear has been depressed, the trigger bar disconnects from the sear. After each shot is fired, the trigger must be released to allow the trigger bar to reconnect to the sear.

A M60 machinegun operating rod has been modified by grinding the bottom surface. This grinding removes the original sear surface and allows the operating rod to clear the plate installed into the lower channel. The recoil buffer yoke has been reduced in height to allow the modified bolt to fully recoil during firing.

Based on the above examination, the semiautomatic copy of the M60 machinegun is designed and manufactured to function in only the semiautomatic mode. Provided that the receiver construction is as described above and incorporates the welding described in paragraph 3 on page one of this letter, the sample is classified a firearm as that term is defined in 18 U.S.C., Chapter 44, Section 921(a)(3)(A).

Please be advised that this determination is based on the sample as submitted using a newly manufactured receiver and incorporating the additional described welding. If the design, dimensions, configuration, materials used or method of construction are changed, this classification is subject to review. We would also point out that an existing M60 machinegun modified to the above configuration would still be a machinegun as defined.
It is suggested that a model designation be assigned which will clearly distinguish the semiautomatic firearm from an M60 machinegun. Once a model designation has been assigned, please provide this office with the designation and the serial number range that will be used on the firearms.

The submitted sample is being returned under separate cover.

We trust that the foregoing has been responsive to your inquiry. If we can be of any further assistance, please contact us.

Sincerely yours

Edward M. Owen, Jr.
Chief, Firearms Technology Branch