



DEPARTMENT OF THE TREASURY BUREAU OF
ALCOHOL, TOBACCO AND FIREARMS WASHINGTON,
DC 20226

JAN 2 01998

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American Arms/Delta 1469
Greg Street Sparks,
Nevada 89431

Gentlemen:

This refers to your letter of December 16, 1997, with which you submitted a sample of a semiautomatic weapon based on the Browning Model 1919 machinegun design you desire to manufacture.

Examination of the submitted sample, serial number AM0001, indicates that it is a firearm based on the Browning Model 1919 machinegun. The receiver has been constructed utilizing a standard Model 1919 machinegun trunion, bottom plate, top plate, left side plate, and back plate. A new right side plate approximately .065 inches thicker than a Model 1919 machinegun side plate has been fabricated and assembled to the above mentioned components. This side plate has been slotted to permit assembly and function with a redesigned Browning Model 1919 barrel extension, lock frame and bolt.

The trigger has been redesigned to permit only a single shot to be fired each time the trigger is pulled. The redesigned trigger also incorporates a trigger return spring and the forward engagement surface and trigger arm width have been constructed such that they are not compatible with a standard Model 1919 sear plate. The forward portion of the trigger arm is spring loaded to act as a disconnecter. A new sear plate has been fabricated that is wider than standard. Additionally, the trigger engagement area of the sear plate has been designed such that the trigger will not reengage the sear plate unless the trigger is released after each shot is fired.

The rear of the bolt has been machined to accept the above described sear plate. This machining prevents the installation of a standard Model 1919 sear plate.

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The right side of the bolt has had two lengthwise grooves machined to a depth of approximately .062 and .115 inches. These grooves permit assembly and function in the redesigned receiver.

The rear spacer in the lock frame has been modified by the addition of a screw used to mount the trigger return spring and also act as a trigger travel stop. This spacer is welded in place. The right side of the lock frame has been grooved to a depth of approximately .0972 inches for a length of approximately 3.422 inches to permit assembly and function in the redesigned receiver. The accelerator has been machined to allow clearance for the redesigned trigger arm.

The right side of the barrel extension has been grooved in two areas to a depth of approximately .064 inches to permit assembly and function in the redesigned receiver. The rear of the barrel extension has been relieved to permit clearance of the forward portion of the trigger arm. A cross bolt type safety has been added to the outside of the backplate.

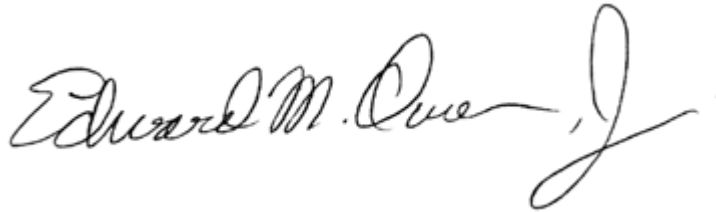
The above internal component configurations and modifications can be used in producing a semiautomatic weapon based on the Model 1919 machinegun design, provided that the redesigned right side plate is permanently attached to the trunion, bottom plate and top plate by means of deep penetrating, full fusion, gas or electric steel seam welds.

Please be advised that this determination is based on the sample as submitted, if the design, dimensions, material used, configuration or method of construction are changed, this classification is subject to review. Additionally, this determination applies only to the firearm in question being manufactured in the United States, we would point out that the firearm likely would not qualify for importation under the provisions of 18 U.S.C. S 925(d)(3). As a result, the receiver for the weapon in question could not be imported.

The sample is being returned under separate cover.

American Arms/Delta we trust that the foregoing has been responsive to your inquiry, if we may be of any further assistance, please contact us.

Sincerely yours,

A handwritten signature in black ink, reading "Edward M. Owen, Jr." with a stylized flourish at the end.

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