



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, DC 2022G

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JUN 18 1997

Mr. Tim Bero
Technetwork International, Inc.
55326 Timber Road
Vernonia, Oregon 97064

Dear Mr. Bero:

This refers to your letter of May 14, 1997, with which you submitted a firearm for classification under the provisions of 18 U.S.C., Chapter 44.

Examination of the submitted sample, serial number T001, indicates that it is a semiautomatic firearm based on the Browning HB M2 .50 caliber machinegun design. The receiver assembly has been constructed from a standard Browning HB M2 type left side plate, bottom plate and trunion. A newly manufactured right side plate has been fabricated from stock having a thickness of .375 inches. The interior surface of the right side plate has been machined such that two rails protrude into the receiver cavity approximately .060 inches.

The upper rail is approximately 15 7/8 inches in length and approximately 1/2 inch in height. The upper edge of this rail is located approximately 1 inch below the top of the side plate. The rear of the rail is located approximately 13/16 inch forward of the rear of the side plate. The purpose of this upper rail is to prevent the installation of a standard Browning HB M2 type machinegun bolt.

The lower rail is approximately 10 7/8 inches in length and is located such that its bottom edge contacts the inner surface of the bottom plate. The height of the lower rail is approximately the same as the upper rail. The rear of the lower rail is located approximately 13/16 inch forward of the rear of the side plate. The purpose of the lower rail is to prevent the installation of a standard Browning HB M2 type barrel extension and oil buffer assembly.

Mr, Tim Bero

The top plate has been modified by eliminating the bolt latch bracket and welding a steel block approximately 1 1/4 inches in height, 3/4* inch in length and 1/4 inch in thickness to the right side of the top plate bracket and the top plate. The block is located immediately behind the "V" slot in the top plate bracket. This modification prevents the installation of a standard Browning HB H2 type trigger bar.

The trigger bar has been redesigned by adding a new front section that incorporates a spring loaded, disconnecter. This tilting disconnecter is designed to contact the upper right edge of the sear located in the bolt.

The bolt has been modified by machining the slot for the sear such that a standard Browning HB M2 type machinegun sear cannot be installed in the bolt. The new sear is configured such that its upper surface is below the top of the bolt. In order for the disconnecter to depress the sear, a notch has been cut on the rear of the bolt exposing the upper right corner of the sear. Additionally, the bolt has no provision for the installation of a side firing sear slide. The bolt has also been modified by machining a groove along the upper right side of the bolt body. This groove allows the bolt to be installed into the redesigned receiver. The redesigned bolt, trigger bar and sear allow the weapon to fire one shot each time the trigger is depressed.

The left side plate has been modified by welding closed the access for the side firing sear. Therefore, a side plate trigger assembly cannot function on the firearm. A steel plate approximately 8 1/16 inches in length, 1 3/16 inches in height, and 1/4 inch in thickness is affixed to the inside upper rear of the left side plate.

The barrel extension has been modified by machining a groove along its rear lower right side. The purpose of this groove is to permit the barrel extension to be installed into the receiver.

Mr. Tim Bero

The oil buffer assembly has been modified by machining a groove along its front lower edge. The purpose of this groove is to permit the oil buffer assembly to be installed into the receiver.

The sample, as submitted, was assembled with alien head screws. However, you indicated that the production version of the weapon will be assembled by rivets and welding.

The above weapon as submitted is a firearm as that term is defined in IS U.S.C., Chapter 44, Section 921(a)(3)(A) provided that in production versions the left and right side plates are welded to the top plate, bottom plate, and trunion. All welds must be deep penetrating, full fusion, gas or electric steel seam welds.

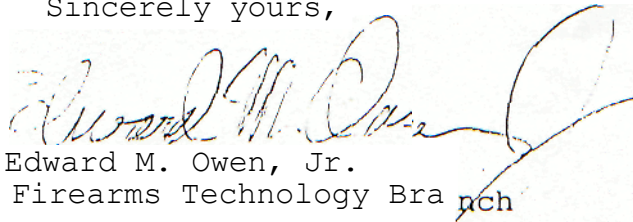
Please be advised that this determination is based on the sample as submitted. If the design, dimensions, material used, configuration, method of construction or method of assembly are changed, this classification is subject to review.

It was noted during our examination that the weapon is not marked as required by 27 CFR, Section 178.92(a)(1). The firearm is marked TNW Vernonia QR. The letters QR are not a recognized abbreviation for the state of Oregon. Additionally, the firearm is not marked with a caliber designation. Any firearms you manufacture must be marked as required by the cited section.

The 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,

A handwritten signature in blue ink, appearing to read "Edward M. Owen, Jr.", is written over a light blue rectangular stamp. The signature is fluid and cursive.

Edward M. Owen, Jr.

Chief, Firearms Technology Branch