



CeaseFire Pennsylvania is the advocacy arm of CeaseFirePA, Pennsylvania's gun violence prevention organization. We work with mayors, police chiefs, faith leaders, community organizations and individual Pennsylvanians taking a stand against gun violence. We are the largest gun violence prevention organization in Pennsylvania and engage in education, coalition-building and advocacy with the goals of reducing gun violence, stopping the flow of illegal guns into our communities and keeping guns out of the hands of those who should not have them.

Pennsylvania suffers more than 1,400 gun deaths a year, and the problem is not limited to our large urban centers. Almost 50% of the law enforcement officers killed in the line of duty in Pennsylvania in recent years have been killed with long guns, often with semi-automatic rifles. This is higher than the national average. We are concerned that bump stocks, which make semi-automatic rifles even more lethal, are legal and easily accessible. While legislation to regulate bump stocks is pending in the Pennsylvania legislature, a pragmatic, effective, and nation-wide solution is needed from Congress and ATF. We hope that Congress will act to protect communities all over the country from another devastating mass shooting by banning bump stocks and all other similar firearm devices or accessories. In the meantime, we urge the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) to issue a new rule clarifying that the definition of "machinegun" in the National Firearms Act of 1934 includes conversion devices like bump stocks that convert a semi-automatic rifle into the functional equivalent of a fully automatic rifle.

On October 1, 2017, in Las Vegas, Nevada, a gunman on the 32nd floor of the Mandalay Bay Hotel opened fire into a crowd of 22,000 concertgoers at the Route 91 Harvest music festival. In what became the deadliest mass shooting in modern U.S. history, the gunman fired more than 1,000 rounds of ammunition in 11 minutes, killing 58 people and injuring more than 500. This rapid-fire was made possible by the "bump stocks" fitted to the shooter's semi-automatic rifles. Congress and ATF must take action to ban bump stocks in order to protect public safety.

As the ATF is undoubtedly aware, fully automatic firearms (otherwise known as "machine guns") are heavily regulated under federal law. The National Firearms Act of 1934 and Gun Control Act of 1968 make machine guns extremely difficult to obtain. However, bump stocks enable gun owners to bypass federal regulations by altering semi-automatic rifles, which are legal, to achieve the fire rate of an automatic rifle. When a semi-automatic with a bump stock is fired, the bump stock rebounds from the recoil energy of the bullet leaving the barrel and sends the gun forward into the shooter's finger repeatedly, thereby effectively mimicking the fire rate of an automatic firearm.¹ In fact,

¹ "Stephen Paddock used a 'bump stock' to make his guns even deadlier," *CBS News*, October 4, 2017, available at <https://www.cbsnews.com/news/bump-fire-stock-ar-15-stephen-paddock-guns-deadlier/>.

the founder of the bump stock created the device to simulate automatic fire.² 12 of the Las Vegas shooter's semi-automatic firearms were fixed with bump stocks, which allowed him to fire 90 shots in 10 seconds - a speed that would otherwise be impossible for semi-automatic rifles.³ Such effects of bump stocks make them a dangerous risk to public safety.

Following the Las Vegas shooting, the vast majority of the American public agrees that there is an urgent need to ban bump stocks and similar devices. In an October 2017 survey, 82% of Americans supported banning bump stocks and similar firearm attachments.⁴ Similarly, nearly three-fourths of registered voters in gun-owning households support banning bump stocks.⁵

No one needs this dangerous "accessory." We urge you to take action to protect the American public.

Thank you for the opportunity to submit this comment.

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² "Lawmakers are zeroing in on 'bump stock' devices after the Las Vegas shooting – here's how they work", *Business Insider*, October 5, 2017, available at <http://www.businessinsider.com/what-is-a-bump-fire-stock-legal-does-it-do-2017-10>.

³ "What is a Bump Stock and How does it Work?", *New York Times*, October 5, 2017, available at <https://www.nytimes.com/interactive/2017/10/04/us/bump-stock-las-vegas-gun.html>

⁴ Clifford Young, Julia Clark, Mallory Newall, "Majority of Americans Hold Incorrect Assumption About Guns," (IPSOS, 2017) available at <https://www.ipsos.com/sites/default/files/ct/news/documents/2017-10/NPR%20Gun%20Control%20Topline%2010%2011%202017%20final%20.pdf>.

⁵ "Majority of Gun Owners Support Banning Bump-Stocks, Post-Vegas Poll Shows," *The Trace*, October 11, 2017, available at <https://www.thetrace.org/rounds/majority-gun-owners-support-banning-bump-stocks-post-vegas-poll-shows/>; See Morning Consult, National Tracking Poll #171004, October 5-9, 2017, available at <https://www.politico.com/f/?id=0000015f-0835-d26f-ab5f-887f5dfd0001>.