



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Martinsburg, West Virginia 25405 903050:MRC  
www.atf.gov 3311/2012-319

Mr. William Ashcroft  
Rock Ridge Machine Works, Inc.  
871 N. Reading Road  
Ephrata, Pennsylvania 17522

APR 02 2012

Dear Mr. Ashcroft:

This is in response to your correspondence to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Branch (FTB), asking FTB to examine and determine whether the two versions of the 1903 bolt-action centerfire rifles that you are manufacturing/assembling qualify as curio or relic ("C&R") firearms. You have delivered under separate cover, one 1903-A3 rifle (serial# 4745916) manufactured with an original M1903 Smith-Corona action/receiver; and one 1903-A4 rifle (serial# 3751841) manufactured with a Remington M1903 action/receiver (see enclosed photos of both rifles).

As background, the term "**curio or relic**," as specified in 27 CFR § 478.11, includes firearms which are of special interest to collectors "by reason of some quality other than is associated with firearms intended for sporting use or as offensive or defensive weapons." To be recognized as C&R items, firearms must fall within one of the following categories:

- (a) *Firearms which were manufactured at least 50 years prior to the current date, but not including replicas of such firearms;*
- (b) *Firearms which are certified by the curator of a municipal, State, or Federal museum which exhibits firearms to be C&R items of museum interest; and*
- (c) *Any other firearms which derive a substantial part of their monetary value from the fact that they are novel, rare, bizarre, or because of their association with some historical figure, period, or event. Proof of qualification of a particular firearm under this category may be established by evidence of present value and evidence that like firearms are not available except as collector's items, or that the value of like firearms available in ordinary commercial channels is substantially less.*

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In your correspondence, you explain that you will be producing the above-described rifles with newly manufactured replacement barrels. Further, you state that the 1903-A4 rifle will be assembled with a newly manufactured replacement stock made to the original design specifications. You indicate, additionally, that the 1903-A3 will be assembled with original wood stocks from the 1950s. Your company will also be using in the assembly of both rifles the original "GI" stock butt plates, bolts, and fire-control components. Finally, the 1903-A4 will be supplied with a replica of the original Weaver 330C (M73B1) riflescope and a replica of the original Redfield Jr. scope-mount ring and base set.

We should point out that ATF has long held that any activities resulting in the making of firearms for sale or distribution, to include installing parts in or on firearm frames and receivers, and processes that primarily enhance a firearm's durability, constitute firearms manufacturing.

As you are aware, under 27 CFR § 478.92, **licensed manufacturers** or licensed importers of firearms, **must legibly identify each firearm manufactured or imported as follows:**

*...(i) By engraving, casting, stamping (impressing), or otherwise conspicuously placing or causing to be engraved, cast, stamped (impressed) or placed on the frame or receiver thereof an individual serial number. [NOTE: This section further states that] **the serial number must be placed in a manner not susceptible of being readily obliterated, altered, or removed, and must not duplicate any serial number placed by you on any other firearm. For firearms manufactured or imported on and after January 30, 2002, the engraving, casting, or stamping (impressing) of the serial number must be to a minimum depth of .003 inch and in a print size no smaller than 1/16 inch; and***

*(ii) By engraving, casting, stamping (impressing), or otherwise conspicuously placing or causing to be engraved, cast, stamped (impressed) or placed on the frame, receiver, or barrel thereof certain additional information.*

*This information must be placed in a manner not susceptible of being readily obliterated, altered, or removed. For firearms manufactured or imported on and after January 30, 2002, the engraving, casting, or stamping (impressing) of this information must be to a minimum depth of .003 inch. The additional information includes:*

*(A) The model, if such designation has been made;*

*(B) The caliber or gauge;*

*(C) Your name (or recognized abbreviation) and also, when applicable, the name of the foreign manufacturer;*

*(D) In the case of a domestically made firearm, the city and State (or recognized abbreviation thereof) where you as the manufacturer maintain your place of business; and*

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*(E) In the case of an imported firearm, the name of the country in which it was manufactured and the city and State (or recognized abbreviation thereof) where you as the importer maintain your place of business. For additional requirements relating to imported firearms, see Customs regulations at 19 CFR part 134.*

In light of the requirements described above, the FTB evaluation found that you have engaged in the manufacture of firearms and, further, FTB's inspection of the receiver and exposed barrel did not reveal your manufacturer's markings. If you have placed your markings in an area that is covered by the stock or handguards, this would not be considered conspicuous in accordance with 27 CFR 478.92.

In conclusion, FTB has stated in the past that replacing worn or broken parts with newly manufactured parts that are manufactured to the original specifications would not remove the firearm's C&R status. Therefore, the two rifles that you have submitted to FTB merit classification as C&R items.

To facilitate the return of your samples, please provide FTB with the appropriate FedEx or similar account information within 60 days of receipt of this letter. If you don't need to have your samples returned, please fax FTB at 304-616-4301 with authorization them on your behalf.

We trust the foregoing has been responsive to your request.

Sincerely yours,



John R. Spencer  
Chief, Firearms Technology Branch

Enclosure