



## **NATIONAL SHOOTING SPORTS FOUNDATION, INC.**

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### **Dramatic Price Increases and Reduction in Supply**

Compelling the use of this unreliable sole-sourced technology will dramatically reduce the product selection available to law-abiding consumers in California, because some manufacturers will choose to abandon the California market rather than incur substantial costs associated with complying, which would include purchasing (at monopolistic prices) very expensive equipment and patented technology and completely redesigning their manufacturing processes, plant and equipment.

The price of firearms for all consumers, including municipalities and the State purchasing firearms for law enforcement agencies, would dramatically increase. The Sporting Arms and Ammunition Manufacturers' Institute (SAAMI) estimates a price increase of approximately \$200 per firearm. Firearms for the commercial, law enforcement and military markets are all manufactured at the same time on the same plant and equipment manufacturing processes. Companies do not have "law enforcement only" production lines and certainly do not have "California only" production lines. The cost would have to be spread across all products in all markets necessarily resulting in significantly higher prices for all products.

Firing pins are typically purchased in bulk from suppliers and not manufactured by firearm makers. Under proposed legislation, the cost of firing pins would go from pennies to several dollars adding significantly to the price of firearms. Under federal law, the frame or receiver of the firearm is the part that must be serialized. If proponents of microstamping have their way, it would be necessary to serialize multiple parts (each manufactured at different times and locations) and coordinate the assembly to ensure that the parts all had the same serial number. How would an assembler know whether a component part had the correct serial number for the firearm they were then assembling since the number would be microscopic in size? The assembly of firearms is still a human process, and as such, it is subject to the occasional error. Despite the best efforts of humans and machines, it would be impossible for a manufacturer to guarantee that only correctly corresponding, serialized parts were assembled into a firearm. Once this inevitable consequence of manufacturing reality is admitted as fact in the courts, the whole serialization mandate becomes suspect.

Furthermore, all serialized parts would become worthless if any single part were rejected for quality control reasons. Clearly, proposed legislation would force a radical and complete redesign of time-tested, finely tuned and efficient manufacturing processes. It would cost millions of dollars in capital investment to comply with such requirements.

Advocates of microstamping fail to consider how or whether the technology can realistically be integrated into modern manufacturing processes.

### **Impact on State and Municipal Budgets – Law Enforcement Firearms**

A study detailing the impact microstamping would have on state and municipal budgets, given the dramatic increase in the cost of law enforcement firearms, would be an appropriate subject for state legislatures to consider. We are unaware of any study that attempts to compare the costs of this flawed technology to taxpayers, relative to other proven and effective crime reduction strategies.

There is, of course, no *bona fide* reason to exempt law enforcement firearms from this requirement, as the theory behind this proposal would be equally of assistance in law enforcement-involved shootings. Exempting law enforcement firearms would not, for the reasons discussed above, stop a dramatic increase in the price of law enforcement firearms.