Prepared Testimony of
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Everytown for Gun Safety

House Judiciary Committee

April 4, 2024

Chairman LaLonde and distinguished members of the committee:

Thank you for the opportunity to testify today. My name is Greg Lickenbrock, and I am the senior firearms analyst for Everytown for Gun Safety, the country's largest gun violence prevention organization. I serve as Everytown's technical advisor and firearms expert.

Before joining Everytown, I spent a decade in the gun industry as a magazine editor, where I tested hundreds of firearms while working with people at every level of the industry, from CEOs and marketing professionals to engineers and dealers — including those who knew that "ghost gun" kits skirted firearm regulations.

Since 1968, the federal Gun Control Act (GCA) has required licensed gun makers to engrave or imprint serial numbers on their firearms' frames or receivers — the basic building blocks of every firearm. The bottom half of modern pistols, which includes the grip and trigger, is considered the frame. For many rifles, including AR-15s, the receiver is considered the bottom half of the gun. But I want to point out that large gun manufacturers have been adding serial numbers to their firearms since the Industrial Revolution. Serial numbers help gun makers track when their guns come off the assembly line.

The GCA also requires that gun makers, importers, and dealers — Federal Firearms Licensees (FFLs) — log the serial numbers of firearms that enter and leave their inventories. So if a gun is later recovered from a crime scene, police can contact the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), which will trace the gun back to its first point of sale. The ATF does this by contacting the manufacturer, finding out where the gun was sold, and working down the supply chain to the dealer. Because no federal entity is allowed to hold onto firearms transaction records. The burden of recordkeeping rests on the shoulders of FFLs, and this is why serial numbers are so crucial to law enforcement investigations. Additionally, since 1993, federal law has required that FFLs perform background checks on non-FFL customers.

This brings us to privately made firearms (PMFs), which are also known as "ghost guns" because they are not manufactured with serial numbers and are thus very difficult, if not impossible, for law enforcement to trace when they show up at crime scenes.

There are **two** basic types of PMFs today: The vast majority are firearms built with parts kits, and a much smaller percentage are made using 3D printers.

Parts Kits: For several years now, dozens of online retailers have sold gun-building kits that make it easy for people to produce complete firearms in minutes. The kits include what are known as "80-percent"-finished frames or receivers as well as the jigs, drill bits, and instructions required to complete them. As my colleague Elisabeth Ryan mentioned last week, the "80-percent" name is a misnomer, however, as these frames are nearly complete. And retailers sold these kits for years without background checks and claimed that they are not firearms.
To complete an "80-percent" frame from Polymer80 — the largest retailer in this space — for a Glock-style pistol, you simply have to drill out two holes and remove five plastic tabs (as shown

in green below). Once that is done, other parts, such as the slide and trigger, can be added to the frame to complete the pistol.

Polymer80 included red jigs and drill bits with its "80-percent" pistol frames.

The frame completion steps are shown in green.

The "80-percent" lower receivers for AR-15s require slightly more machining but can still be completed in minutes. You simply drill out three holes as well as the "trigger cavity" where the trigger and safety will be installed. The steel jig quite literally guides your drill. Then, once the lower receiver is completed, you can install an upper receiver and have a functional rifle.

An "80-percent" lower receiver for an AR-15 on its own (left) and placed in a jig (right).

3D Printing: While firearms can be completely 3D-printed from plastic, like the single-shot, .22-caliber Liberator pistol, today it's much more common for people to build sturdier firearms by 3D-printing frames and receivers from plastic and adding metal components, such as barrels

and slides, made by established gun companies. The 3D printers, materials, programming files, and gun parts are all readily available online.

A Glock-style PMF with a 3D-printed frame recovered in New York.

While hobbyists might want to build their own guns, ghost guns are overwhelmingly obtained by criminals, gun traffickers, and others legally prohibited from buying firearms, including teens. We at Everytown have seen mass shootings committed with ghost guns and several incidents where high schoolers have shot their classmates and friends, either accidentally or intentionally, with ghost guns that they bought online and assembled at home. The ATF estimates that police have recovered over 71,000 ghost guns between 2016 and 2022.

The ATF responded to this danger by finalizing a rule that went into effect in August 2022 and requires that “readily completed” frames and receivers be treated as if they are complete, meaning they must be serialized and sold with background checks. According to the rule, the ATF will consider several factors in determining if a frame or receiver can be “readily completed,” including the time it takes to finish the process, the ease of doing so, and the equipment required. The ATF will also look at how gun-building kits are sold and marketed to determine if they need to be serialized and sold with a background check.

S.209 is a smart, well-reasoned approach that builds on the ATF’s regulations and simply requires that all firearms — whether they’re made by a manufacturer or made at home — are treated equally. By requiring serial numbers on all frames and receivers, once S.209 goes into effect, it will immediately prevent ghost gun retailers from selling *unserialized* frames and receivers into the state of Vermont. But it is very important to note that many of those retailers, including Polymer80, do in fact sell *serialized* gun-building kits. So Vermonters can still enjoy the hobby of building a gun after they pick up the kit from a local dealer.
Those Vermonters who already own 80-percent frames and receivers can take them to one of the many FFLs in the state to have serial numbers added using laser engravers, dot-peen tools, and other devices that range in price. As of last month, Vermont has 263 licensed gun dealers who can carry out basic gunsmithing tasks, such as repairs and adding serial numbers, in addition to Vermont’s 92 licensed gun manufacturers, for a total of 355 locations.

Most “80-percent” pistol frames today already have steel serialization plates embedded within their plastic in a position consistent with Glock-style pistols. Most AR-15 receivers are made of metal that is easy to engrave with a serial number. And people who want to 3D-print frames and receivers can print the plastic around a serialization plate, or simply solder one in place, and then take the component to an FFL to obtain a serial number.

All Polymer80 pistol frames feature steel serialization plates.

In other words, none of S.209’s provisions are particularly burdensome. I say that as a gun owner who has gone through the background check process numerous times. I’ve also repaired and customized firearms, and I understand why a hobbyist would want to build their own guns, and S.209 does not prevent that in any way. This bill simply prevents people from building untraceable firearms and avoiding the accountability that comes with gun ownership.

Thank you for your time and consideration.