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May 29, 2008

H:\Data\ATF\Regulatory Guidance\0400.626, Original Signatures on Licenses & Permits\Inquiry to ATF.doc

Gary L. Bangs  
Chief, Explosives Industry Programs Branch  
Bureau of Alcohol, Tobacco, Firearms, and Explosives  
99 New York Ave.  
Mailstop 6E405  
Washington, D.C. 20226

Subject: Original Signatures on Certified Copies of  
Explosives Licenses and Permits  
Your Ref: 27 CFR 555.103  
File No: 0400.626

Dear Mr. Bangs:

The January 2007 edition of the FFL Newsletter ([copy attached](#)) discusses the acceptability of alternate forms of signatures on firearms licenses in complying with license verification requirements of the Federal Firearms Regulations. In this newsletter, ATF states the following:

1. "... a reproduction of the license may be used, rather than an original copy."
2. "It is ATF's position that any signature – whether it is done by hand with a pen, stamped, or auto-penned – is an original signature, if the person whose signature appears intends it as an original signature."
3. "... ATF has determined that scanned or e-mailed versions of licenses are also acceptable."

OCS is interested in determining whether these statements and opinions of ATF in relation to firearms regulations also apply to similar requirements in the explosives regulations. Specifically, in regards to compliance with the requirements of 27 CFR 555.103:

1. Is a photocopy of an explosives license or permit, with a photocopied signature acceptable?
2. Is a fax of an explosives license or permit acceptable?
3. Is a scanned or e-mailed version of a license or permit acceptable?
4. Is a license or permit with any signature – whether it is done by hand with a pen, stamped, or auto-penned – if the person whose signature appears intends it as an original signature, acceptable?

Thank you for your consideration of this inquiry.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Boston', with a long horizontal flourish extending to the right.

David W. Boston  
President