


1-May-20
ASB Std 093, Standard Test Method for Examination and Testing Firearms

Note: a specific Proposed Resolution must accompany each comment or it cannot be considered.

#	Section	Type of Comment (E-Editorial, T-Technical)	Comments	Proposed Resolution	Final Resolution
8	Title	T	Title should indicate this is for use in forensic analysis	add "For Forensic Analysis" to the end of the current title	Accept with modification: The title was edited to read: <i>Standard Test Method for the Forensic Examination and Testing of Firearms.</i>
9	Scope	T	Same comment as title. Further, this appears to be a seems to represent a "60,000 foot" view, and does not address many basic steps to serve as a guide for those without significant knowledge of firearms and firearm design. Assuming that is the intention, we would offer the following comments (if the draft is supposed to be a detailed document, then we believe there is much more work that needs to be done.)	add "for the purposes of forensic analysis" following "technicians" in the first sentence. Also, identify that this is for those with prior firearms expertise. If this is meant to be a comprehensive document for those unfamiliar with firearms it is not sufficiently detailed to provide good guidance.	Reject: The Working Group feels the Scope is sufficient and addresses the intended users.
15	4.2.1	E	Refers a protocol, but offers no refernce where the protocol can be found	provide a reference	Reject: This section does not reference a protocol therefore a reference is not needed.
16	4.4.1	E	References protocols, but offers no reference to those protocols	provide a reference	Reject: This section refers to the laboratory using this standards and they will be using their own protocols.
17	4.4.2	E	References protocl, but offers no reference to those protocols	provide a reference	Reject: This section refers to the laboratory using this standards and they will be using their own protocols.
18	4.6.9	T	identifies handling and evaluation of the magazine, but should clearly state there may be a loaded round in the chamber that must be checked and cleared. There should also be a mention of ammunition (if any) in the chamber and/or magazine—headstamp information, etc.		Reject: Section 4.2.2 addresses that the firearms is unloaded prior to examinations.
19	4.6.10	T	identifies handling and evaluation of the magazine, but should clearly state there may be a loaded round in the chamber that must be checked and cleared. There should also be a mention of ammunition (if any) in the chamber and/or magazine—headstamp information, etc.	Provide additional text as indicated	Reject: Section 4.2.2 addresses that the firearms is unloaded prior to examinations.
3	4.6.10	T	The items required for documentation in this section should be optional because it is not necessary for every examination.	Add "The documentation of the following features may not be necessary for every firearm. "	Reject: Should is a guideline. See revised foreword that explains how ASB defines "Should".
4	4.7	T	The items required for documentation in this section should be optional because it is not necessary for every examination.	Add "Laboratory policy may dictate when this measurement is required. "	Reject: The foreword addresses this concern.
5	4.8a	T	The items required for documentation in this section should be optional because it is not necessary for every examination.	Add "The documentation of the following features may not be necessary for every firearm. "	Reject: The foreword addresses this concern.
6	4.8d	T	The items required for documentation in this section should be optional because it is not necessary for every examination.	Add "The documentation of the following features may not be necessary for every firearm. "	Reject: The foreword addresses this concern.

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22	4.8	T	Section does not say how to do the evaluation, nor does it provide any guidance of what to look for. As a 60,000' view for trained professionals this may be acceptable, but again, if that's the case it should be noted in the title and "Scope".		Reject: The Working Group feels the Scope is sufficient and addresses the intended users.
7	4.9	T	The items required for documentation in this section should be optional because it is not necessary for every examination.	Add "The documentation of the following features may not be necessary for every firearm. "	Reject: The foreword addresses this concern.
23	4.11	T	In the interest of safety, the document should use stronger language to promote use of a remote firing device in the lab when testing a firearm. There is a good argument that a remote firing device should always be used under the circumstances of forensic analysis.		Reject: section 4.11.1 it is clear that a remote firing device might be necessary and the Working Group feels that should be at the examiners discretion.
24	4.12.2.1 and 4.12.2.2	T	These seem to indicate that the examiner may do more than simply examine: he or she may make assumptions as to the cause of a reported malfunction, and also alter or modify the evidence to make a non-functioning firearm function. As such, these are certainly beyond the scope of anyone but a trained profession with specialized firearms knowledge/training. These also represent a departure in scope from the rest of the document's focus.		Reject: Sections 4.12.2.1 and 4.12.2.2 are not suggesting that untrained examiners perform these functions, nor that trained examiners should make assumptions about what is malfunctioning. Also, forensic examinations often require the examiner make corrections to a non functional firearms to complete the examinations, see section 4.10.1.
20	New Section Needed	T	Following determination that the firearm is unloaded, an "empty chamber indicator flag" should be inserted into the chamber. This should also be added to the list of equipment and materials needed (section 4.1).		Reject: Laboratory policy may indicate as such a device if needed.
21	New Section Needed	T	There is no mention of documenting the presence/absence of ammunition in firearms that don't have a magazine, such as revolvers where the presence of ammunition and/or empty (fired) cases indexed to the cylinder in line with the barrel at time of evaluation should be documented.		Reject: See section 4.6.9 that requires documentation of ammunition and section 4.2.2 that requires the firearm be unloaded prior to examination. This document is intended for use by examiners in the laboratory where the firearm should have been unloaded prior to reception, therefore documentation of what was in the cylinder of a revolver falls outside the scope of this document.
1		T	Describe the firearm to include the following, if known: a) make/manufacturer; b) firearm type (shotgun, rifle, pistol, revolver, etc); c) model; d) caliber/gauge; e) serial number.		Reject: This information is covered in Section 4.6.1.

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2			<p>It is my contention that basic descriptors which record simple information suitable only for firearm licensing and registration purposes (such as make, model, serial number, category and calibre) is a critical flaw in the recording of firearm data. If there is no manufacturer, no model and no serial number...for example a 3d printed copy of a Polymer 80 frame and generic brand slide with a select fire device and fitted with a Glock barrel....what then? what is recorded? What is the standardised terminology to be used? There are likely to be many differing descriptions by firearm examiners who examine the same types of illicit firearm.</p> <p>Illicit firearms often cannot be classified using conventional recording descriptors, such as make, model, and serial number. Many illegal firearms are manufactured using factory manufactured, factory generic and workshop made components, or in any combination of these three sources. This factor, when combined with other data access restrictions between agencies, prohibits the development of robust firearm intelligence data.</p>	<p>The retrieval of forensic firearm data using (in part) alphanumeric identification during examination would enable rapid categorisation of seized firearms including identification of their major parts and accessories by the use of simple descriptor codes, to achieve a complete 'shorthand' record of the illicit firearms which have been seized. Identification codes allow forensic categorisation of firearms which include variations such as generic (aftermarket) parts and accessories and can be easily recorded in a alpha numeric format useful for intelligence data retrieval and searching. These codes are not intended to replace traditional descriptions but to enhance and standardise examination notes.</p>  <ol style="list-style-type: none"> 1. FTZ – non-factory generic parts 2. 9P – extended magazine 3. CNZ – has non-factory/generic accessories fitted 4. ZA – select fire, burst or full auto device 5. 7A – vertical grip 6. 10AR – Red Dot (reflex sight) 7. 12A – Flash Suppressor 8. RFS – Rifle self-loading 9. M – machine gun <p><u>Description</u> FTZ 9P CNZ ZA 7A 10AR 12A RFS MAC</p> <p>–A firearm which has a factory original parts but fitted with a non-factory generic extended capacity magazine; with generic accessories fitted, such as a select fire, burst or full auto device, in this case a bumpy-fire stock, vertical grip, Red Dot (reflex sight), and flash suppressor; and is a machine gun.</p> <p><u>Explanation:</u> The descriptor code FTZ indicates that it has non-factory generic parts, in this case an extended capacity magazine. This also indicates that the other firearm PARTS (other than the extended magazine) are original.</p> <p>The descriptor code CNZ indicates several non-factory/generic accessories such as a select fire, burst or full auto device, vertical grip, Red Dot (reflex sight) and a Flash Suppressor.</p>	<p>Reject: Broader database collection is beyond the scope of this particular document. It is intended only for the examination of individual items of evidence within laboratory settings.</p>
10		T	<p>, the document should start with a reiteration of fundamental firearm safety—specifically: 1) Treat every firearm as if it was loaded 2) ALWAYS keep the muzzle pointed in a safe direction 3) Never put your finger near the trigger until ready to initiate the firing sequence. These should be emphasized.</p>		<p>Reject: ASB Best Practice Recommendations for the Safe Handling of Firearms and Ammunition [1] (currently in the process to be published) addresses this issue.</p>
25			<p>Far too much ambiguously imperative language, which lends itself to being quoted out of context. It also relies too heavily on the doubtful assumption that in trying to determine what has to be done under which circumstances, readers will not only refer to the information under the relevant headings, but also the Foreward, a section typically consisting of boilerplate that is of virtually no value to the end user and isn't even part of the Table of Contents.</p>		<p>Reject: The foreword provides an ample description of how this standard can be applied.</p>

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26			<p>My comment is the same as expressed in Comment #25. Too ambiguous and subject to wide interpretation.

 Specificity is required.</p>		<p>Reject: The foreword provides an ample description of how this standard can be applied.</p>