



STATE OF CONNECTICUT
DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION
OFFICE OF THE COMMISSIONER

September 4, 2013

The Honorable Joe Markley
State Senator, 16th District
Legislative Office Building
Room 3400
Hartford, CT 06106

The Honorable Rob Sampson
State Representative, 80th District
Legislative Office Building
Room 2801
Hartford, CT 06106

Dear Senator Markley and Representative Sampson,

Please allow this to respond to your letter dated August 13, 2013. Thank you for expressing your concerns; I will address each in turn.

First, allow me to begin with the issue of the social security numbers. You are correct that social security numbers were requested on several of the new forms. These forms should have reflected that the social security field was "optional." Once the error was discovered, the forms were removed from the website so that they could be modified. They are currently under review, the wording is in the process of being changed and the revised forms will be back on the website in the very near future. In the meantime, my staff is directed to accept forms without social security numbers and to inform any persons inquiring that the social security number field is optional.

With regard to certificates of possession for assault weapons, Public Act 13-3, Sections 28(a)(1) and (a)(2) amend C.G.S. §53-202d to require that lawful possessors of assault weapons "shall apply...for a certificate of possession with respect to such assault weapon." Section 53-202c (as amended by the Act) also references a certificate of possession. Moreover, the certificate of possession is required to contain several pieces of information in accordance with the Act, such as "a description of the firearm

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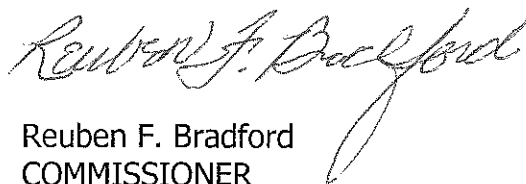
that identifies it uniquely, including all identification marks, the full name, address, date of birth **and thumbprint of the owner**, and any other information as the department may deem appropriate." (emphasis added) Section 28(a)(4). This information is actually important, as we have already discovered one convicted felon attempting to register his assault weapon.

With respect to your concerns regarding large capacity magazines, P.A. 13-3 requires any person who lawfully possesses a large capacity magazine to "apply" to "declare possession of such magazine" by January 1, 2014. See Sec. 24(a). P.A. 13-3 also states as follows: "Such application shall be made on such form or in such manner as the Commissioner of Emergency Services and Public Protection prescribes." The form created for a lawful owner of a large capacity magazine to comply with this requirement is entitled "Declaration of High Capacity Magazine(s)" and only references "applicant" in the name section of the form. Since the forms are currently being revised, we will remove the reference to "applicant" in the name field to avoid any further confusion.

Finally, it might be helpful for you to be aware that frequently asked questions regarding the new gun legislation are also posted on our website under "Featured Links." For now, I trust that the above explanations address your concerns.

Thank you for bringing this matter to my attention and affording me the opportunity to respond.

Sincerely,



Reuben F. Bradford
COMMISSIONER



State of Connecticut
GENERAL ASSEMBLY
STATE CAPITOL
HARTFORD, CONNECTICUT 06106-1591

August 13, 2013

Commissioner Reuben Bradford
Department of Emergency Services and Public Protection
1111 Country Club Road
Middletown, CT 06457

Dear Commissioner Bradford,

Please consider this our request for clarification regarding the many new regulations and declarations for firearms, as required by PA 13-3. While we understand that the law is loosely worded and difficult to navigate, we are struggling with the lack of information available. We have been bombarded with questions from constituents who are only asking that the law be further clarified so that they do not accidentally become felons as the various registration and declaration deadlines arrive.

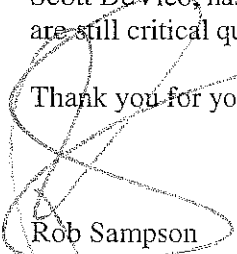
Most of the questions we have received are specifically related to the declarations for "assault weapons" and "large capacity magazines." The intent of the legislation was for citizens to declare ownership of their "assault weapons" and "large capacity magazines," but the forms are labeled as "applications" instead of "declarations." This needs to be corrected as the law requires that they must simply "declare" their firearms, and not "apply" for anything. This wording is confusing and goes beyond the requirements of PA 13-3. There should be no reason why firearms that were previously legal to own should be subject to an "application" process.

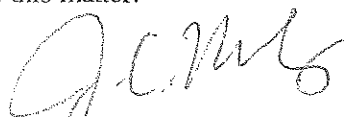
We are concerned that the forms require a Social Security number. When these firearms were initially purchased no such information was required. We were told that that a Social Security number would not be required and instead would be considered merely optional, but have not yet seen any progress on this. If a person does not want to provide their Social Security number, they shouldn't have to. It is a violation of privacy, not to mention Federal law, and we do not see why this information is asked for in the first place.

Finally, there is an issue with the fingerprint requirements. Some of the forms request a fingerprint or thumbprint, though there is no such requirement in PA 13-3. We understand that this is a result of previous regulations left over from the previous assault weapon ban in the early 90's. If that is indeed the case, then we would suggest that these requirements be uniform but also clearly indicated on the forms and their instructions for completion.

Respectfully, we ask that you continue to work at clarifying these new regulations and declaration forms. We know that your department has been working diligently to fix these errors and for this, we are grateful. Our government liaison, Scott DeVico, has been especially helpful in answering questions and providing necessary information. However, there are still critical questions left unanswered and our constituents are depending on us to provide answers for them.

Thank you for your time and attention to this matter.


Rob Sampson
State Representative
80th District


Joe Markley
State Senator
16th District

RECEIVED

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