

ALERT

# ATF Moves to Ease Import Restrictions on Dual-Use Frames, Receivers, and Barrels

June 1, 2026

The Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) published a Notice of Proposed Rulemaking on May 8, 2026 that would amend its regulations under 27 C.F.R. Part 478 to clarify when firearm frames, receivers, and barrels with both sporting and non-sporting applications may be imported into the United States. Wiley has advised and advocated on behalf of clients regarding this proposed regulatory revision.

ATF is accepting comments on this proposed rule. Submissions are due on August 6, 2026.

The proposed rule would codify ATF Ruling 2025-1 – which addressed dual-use barrels – and extend the same analysis to firearm frames and receivers. Under the proposed rule, federal firearms licensees may import frames, receivers, or barrels that can be used on both sporting and non-sporting firearms if, at the time of importation, there is an identified sporting configuration for the item. Most significantly, and as advocated for by Wiley on behalf of its clients, **this would apply regardless of whether the item had previously been configured on a non-sporting firearm, military surplus firearm, or firearm regulated under the National Firearms Act (NFA).**

This reflects a significant shift from ATF’s prior approach to dual-use barrels. In a 2005 open letter, ATF took the position that certain barrels capable of use on both sporting and non-sporting firearms were importable only if used to assemble importable firearms. In other words, the importer was restricted in how the barrel, frame, or receiver could be assembled once imported. ATF also considered prior use as part of its analysis and denied permits for barrels previously assembled on non-importable firearms. Under the

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proposed rule, the relevant inquiry would focus on whether the frame, receiver, or barrel may be assembled in a sporting configuration – not whether the same item also could be used in a non-sporting configuration or had previously been used on a non-importable firearm. The proposed rule also would clarify that once a dual-use frame, receiver, or barrel is lawfully imported based on an identified sporting configuration, it may be used to assemble a sporting firearm, non-sporting firearm, or NFA firearm, provided the assembly complies with other applicable federal firearms laws. In particular, ATF emphasizes that domestic assembly must still comply with 18 U.S.C. § 922(r) and the NFA, as applicable.

ATF explained that its updated approach reflects changes in firearms technology and the increasingly modular nature of firearm parts. ATF acknowledged in the notice that many modern frames, receivers, and barrels can be used in both sporting and non-sporting configurations, making dual-use parts a significantly larger part of the market than when ATF issued its 2005 guidance.

As proposed, ATF would implement this approach through amendments to several provisions in 27 C.F.R. Part 478, including §§ 478.39, 478.112, 478.113, 478.113a, and 478.114.

Importantly, the proposed rule would not eliminate restrictions on importing complete non-sporting firearms under 18 U.S.C. § 925(d)(3), nor would it authorize domestic assembly that violates § 922(r) or the NFA. Rather, it would clarify that the importability of the part turns on whether the part has an identified sporting configuration at the time of importation.

The meaning of “identified sporting configuration” is not entirely clear. Affected parties should consider submitting comments to clarify when importers should consider a particular barrel, frame, or receiver to have an “identified sporting configuration.” Currently, for handguns at least, it appears likely that a barrel, frame, or receiver is dual use if it can be assembled without modification (i.e., adding a barrel extension) into a sporting configuration.

Wiley has a robust National Security Practice, which includes issues arising from the ATF, the Bureau of Industry and Security, the Directorate of Defense Trade Controls, and related export control laws and regulations. Should you have any questions about this alert, U.S. export controls, or any other national security-related issues, please do not hesitate to contact the attorney listed on this alert.

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