



DEFENSE LOGISTICS AGENCY  
HEADQUARTERS  
8725 JOHN J. KINGMAN ROAD  
FORT BELVOIR, VIRGINIA 22060-6221

IN REPLY  
REFER TO DLMSO

May 15, 2007

MEMORANDUM FOR JOINT SMALL ARMS COORDINATING GROUP MEMBERS

SUBJECT: Joint Small Arms Coordinating Group (JSACG) Meeting, April 25, 2007

The attached minutes of subject JSACG meeting are forwarded for your information and appropriate action. The Defense Logistics Management Standards Office point of contact is Ms. Mary Jane Johnson, JSACG Chair, DSN 427-0677, (703) 767-0677, e-mail: [Mary.Jane.Johnson@dla.mil](mailto:Mary.Jane.Johnson@dla.mil).

A handwritten signature in dark ink, appearing to read "Donald C. Pipp", is positioned above the typed name.

DONALD C. PIPP  
Director  
Defense Logistics Management  
Standards Office

Attachment

cc:  
DUSD(L&MR)SCI  
Meeting attendees



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May 15, 2007

MEMORANDUM FOR RECORD

SUBJECT: Joint Small Arms Coordinating Group (JSACG) Meeting, April 25, 2007

The Defense Logistics Management Standards Office (DLMSO) chaired a meeting of the JSACG, April 25, 2007, at the McNamara Complex, Fort Belvoir, Virginia. Ms. Mary Jane Johnson, JSACG Chair, facilitated the group's discussions of issues pertaining to the DOD Small Arms Serialization Program (DODSASP). The agenda is at Enclosure 1. Briefings and handouts provided at the meeting are available as links to the meeting agenda on the DLMSO Website at: <http://www.dla.mil/j-6/dlms0/Programs/Committees/JSACG/jsacg.asp>. Approved DLMS changes (ADCs) discussed in the minutes can be accessed at: <http://www.dla.mil/j-6/dlms0/eLibrary/Changes/approved3.asp>.

**Brief Summary of Discussions:**

**1. DRAFT ADC 220 (staffed by PDC 134A) IN TWO PARTS, PART I: REVISE DEFINITION FOR SMALL ARMS TO ADDRESS LIGHT WEAPONS, AND PART II: VISIBILITY AND TRACEABILITY OF CAPTURED, CONFISCATED OR ABANDONED ENEMY SMALL ARMS AND LIGHT WEAPONS.**

a. **DRAFT ADC 220 BACKGROUND:** Draft ADC 220 was staffed by Proposed DLMS Change (PDC) 134A to revise the definition for small arms to encompass small arms and light weapons (SA/LW). At the December 2006 JSACG meeting, the group agreed to change the PDC 134A SA/LW definition to delete "assault rifles" as a separate category as they would be covered under "rifles"; and to replace "revolvers and self-loading pistols" with the term "handguns" which encompasses both revolvers and self-loading pistols, as well as single shot pistols not previously covered by the proposed definition. The JSACG also recommended that the definition of "handguns" be included in the Terms and Definitions published in DLMS and MILSTRAP to complement use of the term in the SA/LW definition. The JSACG chair provided for an additional review of draft ADC 220 after making the changes agreed to. **DISCUSSION:** The JSACG discussed and resolved comments received as a result of staffing DRAFT ADC 220 which incorporated the changes from the December 2006 JSACG meeting. Several comments were received from the SA/LW Implementation Working Group (IWG) chaired by the OSD Treaty Compliance Office (DUSD(AT&L)TC). The SA/LW IWG was involved in the development of the SA/LW definition published in the United Nations (UN) International Instrument to Enable States to Identify and Trace in a Timely and Reliable Manner, Illicit Small Arms and Light Weapons (hereafter referred to as UN Instrument), December 8, 2005 (available at: [http://www.un.org/events/smallarms2006/pdf/international\\_instrument.pdf](http://www.un.org/events/smallarms2006/pdf/international_instrument.pdf)). The UN Instrument definition was closely aligned with the PDC 134A DODSASP SA/LW definition. The JSACG changes to the DODSASP definition discussed at the December meeting

Attachment

increased the disparity with the UN Instrument definition. However, while the JSACG agreed it would be beneficial to align the 2 definitions where possible, the JSACG did not believe that the changes being considered for the DODSASP definition conflicted with the UN Instrument definition. The JSACG deemed the term “handgun” was more inclusive than “revolvers and self-loading pistols” and that assault rifles are covered under rifles, and should not be separately identified for the DODSASP definition as there is no specific definition for assault rifle and it means different things to different interested parties. It was also noted that the DODSASP SA/LW definition is intended to clarify and define SA/LW for the DOD tracking and reporting requirements. As noted in draft ADC 220, the DODSASP was not created nor designed to be used as a tool for tracking DOD weapons for the international community in order to be in compliance with international treaties; however, the information in the DOD Registry may be useful to assist in these obligations. The SA/LW IWG had also recommended the removal of the 200 pound weight limit from the DODSASP definition. The JSACG agreed to remove the weight limit for light weapons in favor of UN Instrument language that light weapons are broadly categorized as those weapons designed for use by two or three members of a crew. The complete list of comments, with JSACG disposition, is at Enclosure 2. **ACTION:** JSACG Chair to incorporate the definition changes agreed to at the meeting and provide the updated draft ADC to the JSACG and Supply Process Review Committee (SPRC) for a final 2 week review prior to releasing the ADC. [SUBSEQUENT TO THE MEETING: On May 2, 2007, a revised DRAFT ADC 220 was provided to the JSACG, SPRC, and SA/LW IWG Chair with comments due by May 16, 2007.]

**b. JSACG AND SA/LW IWG COMMUNICATION.** During discussion of this topic, the SA/LW IWG Chair emphasized the importance for communication between the JSACG and SA/LW IWG members. To this end, the JSACG chair suggested the chairs exchange member lists so each group would be cognizant of their counterpart, and could open communication channels. [SUBSEQUENT TO THE MEETING: On April 25, 2007, JSACG Chair provided the SA/LW IWG chair the JSACG member list to share with SA/LW IWG.]

**c. SERIAL NUMBER SPECIAL CHARACTERS CONCERN.**  
**DISCUSSION:** In response to ADC 220, the DLA Systems Integration Office (DSIO) raised the problem of serial number (SN) special characters. (The chair noted that this issue is not specific to ADC 220 and DLMSO has been looking into this issue independent of the JSACG meeting.) The issue raised was that an asterisk (\*) has been used historically in the small arms SN field in place of foreign characters which are unrecognizable on the keyboard. Under DLMS, the asterisk may be used as a data delimiter in the Accredited Standards Committee (ASC) X12 transactions, and will result in transaction failure when also used in the serial number data field. The DSIO representative asked that the publications addressing use of the asterisk in a serial number field be consistent. He believed that DOD 4140.1-R, DOD 4000.25-2-M (MILSTRAP), DLA One Book, and the applicable Army Regulation provide for use of an asterisk while item unique identification (IUID) policy does not. The JSACG Chair did not believe that DOD 4140.1-R or DOD 4000.25-2-M address use of an asterisk and agreed to review them. DLA and Army should review their Component publications. The UID Policy Office Deputy suggested that small arms industry standards for assigning serial numbers also be reviewed. The Army Executive Agent for Small Arms Logistics agreed to look into the US industry standards. A representative from the Treaty Compliance Office agreed to look into international standard. This should not be an issue for future DOD procurements using the UID DFARS clause, as the clause cites specific IUID policy requirements for what special characters may be used in a SN field, and asterisk is not an

allowable character. However the UID clause will not resolve the issue for legacy items, nor for captured foreign weapons. **ACTIONS: JSACG Chair** to review DOD 4140.1-R and MILSTRAP for guidance on serial number structure and use of special characters, specifically asterisk. **Army Executive Agent for Small Arms Logistics** to research industry standards for assigning SN to determine if standard addresses what special characters are allowed. **OSD Treaty Compliance Office** to research the international standard. **DLA and Army (and the other Services if applicable)** should review their Component publication providing guidance on small arms serial number structure and use of asterisk.

#### **d. DODSASP: POLICY REQUIREMENT VS. STATUTORY**

**REQUIREMENT.** During discussion of the revised definition, it was asked if the revision would impact a statutory requirement for the DODSASP. The chair noted that her prior research on this issue in response to a Navy inquiry found that the DODSASP is not required by statute but is instead a DOD policy requirement developed in response to the Gun Control Act of 1968. She asked that if OSD or the Components were aware of a statutory requirement, they so advise and provide documentation. [SUBSEQUENT TO THE MEETING: JSACG Chair provided the group a copy of a June 24, 1994, Army memorandum from the Department of Army Office of the Judge Advocate General, subject: Statutory Requirement for Unique Item Tracking [Enclosure 4 in pdf]. This memorandum provided an Army legal opinion that the requirement for “cradle to grave” tracking for certain weapons is not required by statute, but is a DOD policy created in response to the Gun Control Act of 1968.]

#### **2. PDC 244, DEFINITION FOR RECONCILIATION, SMALL ARMS AND LIGHT WEAPONS AND CLARIFICATION OF PROCEDURE. BACKGROUND:**

MILSTRAP and DLMS do not provide a definition for small arms reconciliation. The JSACG Chair developed PDC 244 to define small arms and light weapons reconciliation thereby clarifying its meaning and intent. The change was also intended to clarify the associated procedures, and revise the small arms transaction code used with reconciliation to acknowledge that with DLA taking control of the depots many years ago, the reconciliation for weapons at a Defense Depot is an inter-Component reconciliation. Currently the code specifies that small arms reconciliation is intra-Component reflecting terminology not consistent with the reality of today’s environment whereby DLA may store small arms for the Services at DLA’s Defense Distribution Depot Anniston, Alabama (DDAA). PDC 244 had been staffed with the JSACG/SPRC on March 27, 2007, with responses due April 20, 2007. **DISCUSSION:** The group discussed responses to PDC 244 and generally agreed with the change. The PDC 244 comments and disposition are at Enclosure 3. **ACTION:** The Chair recommended an additional 2 week JSACG review period from the date of the meeting prior to finalizing the change as an ADC. [SUBSEQUENT TO THE MEETING: Following the 2 week review period, PDC 244 was approved and released as ADC 244 on May 10, 2007.]

#### **3. PDC 262, UPDATE DLMS SUPPLEMENT (DS) 888A, SMALL ARMS DATA CHANGE.**

PDC 262 updates DLMS supplement 888A, Small Arms Data Change, to stipulate that the DODSASP procedure for changing a serial number when a duplicate is discovered does not extend to the IUID unique item identifier (UII). DOD IUID policy states that the concatenated UII will not change over the life of the item. The change documents that the UII was not added to DS 888A by intent. This change was discussed and agreed to by the JSACG at the April 25, 2007, meeting with UID Policy Office representatives in attendance. **ACTION:**

DLMSO to release an approved change for PDC 262. [SUBSEQUENT TO THE MEETING: PDC 262 was approved and released as ADC 238 on April 27, 2007.]

#### **4. UPDATE ON THE US AIR FORCE (USAF) SMALL ARMS RECONCILIATION AT DLA DEFENSE DISTRIBUTION DEPOT ANNISTON ALABAMA (DDAA).**

**BACKGROUND:** As noted at the December 2006 JSACG meeting, it had been over 10 years since the records for USAF weapons stored at DDAA had been reconciled between USAF and DLA. After looking into the weapons involved, USAF determined that of the approximately 94,000 weapons, USAF was looking to keep approximately 23,000 and planned to follow excess procedures for the remainder. **DISCUSSION:** The USAF provided a briefing updating the status the USAF “inactive” small arms resolution plan. This plan includes providing disposal release orders (DROs) to DDAA for approximately 71,000 of the 94,000 weapons being addressed. USAF and DDAA were currently processing 100 test transactions for this effort. Once successful, USAF anticipated processing 6,000 DROs per month until all 71,000 weapons were released, with an estimated completion date of April 2008. The USAF plan also called for the sight verification of 23,000 remaining weapons at DDAA. The DLA JSACG representative noted that no agreement had been reached to date on a sight verification process, cost, funding, etc. The USAF/DLA reconciliation effort is ongoing with all parties working closely and significant progress being made. Biweekly to monthly joint teleconferences have been in place for some time to focus on, and facilitate, resolution of this issue.

**5. UPDATE ON IRAQ WEAPONS.** The Army Executive Agent for Small Arms Logistics provided an update on precautions Army has taken to prevent a recurrence of the situation documented in the Special Inspector General for the Iraq Reconstruction (SIGIR) report in October 2006. As discussed at the December 2006 JSACG meeting, the SIGIR report concluded that the DODSASP procedures should have applied to weapons purchased by US DOD for subsequent issue to Iraq security forces. However with the exception of weapons procured under 3 Army contracts written by TACOM-Rock Island, Illinois (TACOM-RI), the remaining Army contracts did not include the requirements for DODSASP registration, and that the majority of the weapons had not been registered. Army followed up with US Army Security Assistance Command (USASAC) and has taken measures to assure that when weapons are procured, TACOM-RI will be approached first. If TACOM-RI declines to procure, they will provide USASAC with an update on policy and procedures for registering weapons in DODSASP. These will then be identified to the procuring agency and implemented in the acquisition process, regardless of what Army organization makes the purchase.

Army Logistics Support Activity (LOGSA) noted that significant effort and progress has been made to register the weapons addressed in the SIGIR report, with approximately 260,000 of the weapons having been registered, and approximately 100,000 remaining.

**6. OPEN ACTION FROM DECEMBER 2006 MEETING: RETENTION REQUIREMENT FOR "OLD PAPERWORK".** **BACKGROUND:** At the December 2006 meeting, Navy had asked what the retention requirements were for old hardcopy paperwork (paperwork prior to systems being on-line or paperwork being scanned and filed by electronic means). DLMSO agreed to research the applicable Federal and DOD regulations that promulgate procedures for documentation retention and provide disposition. **DISCUSSION:** DLMSO had not been able to determine specific guidance for retention of old paperwork as of the meeting date. [SUBSEQUENT TO THE MEETING: JSACG Chair sent

the group an e-mail recommending that the Components use the National Archives Web site (URL: <http://www.archives.gov/records-mgmt/ardor/records-schedules.html>) to research document retention requirements that are not promulgated in the DLMS. The schedules are categorized in several specific areas (individual schedules) that are of interest to DOD. Also, should the Component determine, in the case of Navy, the proper schedule that is applicable to the destruction of aged hardcopy paperwork, the Component should seek approval from the appropriate levels within their command prior to destroying the records. The schedules promulgate the minimum records retention period whereby the command and/or Department may require a greater records retention period.

**7. UID PROGRAM OFFICE RECOMMENDATION FOR A SMALL ARMS IUID PROJECT TEAM.** The UID Policy Office Deputy spoke to the group to recommend that the UID Policy Office and JSACG representatives form a project team for a demonstration of IUID automatic data capture methods applied to small arms inventory management. The UID Policy Office would ensure that the project is consistent with IUID policy, and coordinate within OSD and the Components to encourage participation. The JSACG representatives, or their designated participants, would provide research of Service/DOD policy and standards for small arms item identification and support practices; and recommend/provide project selection, criteria, outcomes, etc. Several JSACG representatives believed their Component would be interested in participating in such a team. The Army Executive Agent for Small Arms Logistics was suggested as a possible lead for the effort from the JSACG. **ACTION:** Request JSACG representatives address this issue within their Component and provide chair feedback on their Component participation.

**8. WRAP-UP, NEXT MEETING:** The Chair thanked the participants for their attendance, continued support, and contributions to the JSACG. The JSACG usually meets annually and the chair plans to schedule the next meeting for Spring 2008.

PREPARED BY:

  
 MARY JANE JOHNSON  
 JSACG Chair

APPROVED:

  
 DONALD C. PIPP  
 Director, DLMSO

Enclosures

# AGENDA

## Joint Small Arms Coordinating Group (JSACG) Meeting

April 25, 2007, beginning at 0900

McNamara Headquarters Complex, Conference Room 3501  
8725 John J Kingman Rd, Fort Belvoir, VA 22060-6217

Topic #	TOPIC	LEAD
0900	Opening Remarks	DLMSO JSACG Chair
1	<p><b>DRAFT ADC 220 (staffed by PDC 134A) in Two Parts, Part I: Revise Definitions for Small Arms to Address Light Weapons, and Part II: Visibility and Traceability of Captured, Confiscated or Abandoned Enemy Small Arms and Light Weapons</b></p> <p><b>Comments to DRAFT ADC 220</b> received from OSD Treaty Compliance Office and from Army representative to Treaty Compliance Office Small Arms/Light Weapons Implementation Working Group (SA/LW IWG)</p>	DLMSO
2	<p><b>PDC 244, Definition for Reconciliation, Small Arms and Light Weapons and Clarification of Procedure</b></p> <p>Review/discuss any comments received. <b>PDC 244 was released for staffing 3/27/07. Responses due 4/20/07.</b></p>	DLMSO
3	<p><b>PDC 262, Update DLMS Supplement (DS) 888A, Small Arms Data Change</b></p> <p>Review/discuss any comments received. <b>PDC 262 was released for staffing 4/2/07. Responses due 4/23/07.</b></p>	DLMSO
4	<p><b>Update on the Air Force Small Arms Reconciliation at Defense Depot Anniston Alabama (DDAA)</b> USAF Briefing</p>	USAF/ DLA
5	Update on Iraq Weapons	Army Executive Agent for Small Arms Logistics
6	<p><b>OPEN ACTION from November 2006 Meeting: Retention for "old paperwork" (paperwork prior to systems being on-line or paperwork being scanned and filed by electronic means). Navy asked what the retention requirements are for old hardcopy paperwork. <u>ACTION:</u> DLMSO will research the applicable Federal and DOD regulations that promulgate procedures for documentation retention and provide disposition</b></p>	DLMSO
7	<b>UID Policy Office Recommendation for Small Arms IUID Project Team</b>	UID Policy Office Deputy
	Re-cap of Meeting, Wrap-up, Adjourn	DLMSO

## ENCLOSURE 2: DRAFT ADC 220 COMMENT DISPOSITION

	Draft ADC 220 RESPONSE	DISPOSITION
<p><b>OSD Treaty Compliance Office DUSD (AT&amp;L) TC</b></p>	<p>The Small Arms and Light Weapons Implementation Working Group (SAIWG) has several concerns and questions surrounding the proposed change. For those in attendance, particularly the representatives from the Services and Joint Staff, this was the first they had seen or heard of the proposed change. As of now, the Army representatives see no problem with the definition change. However, since this was the first they had seen of this, they would like to discuss the matter internally as well as with your office.</p> <p><b>Treaty Compliance (TC) Office Comment 1.</b> The first question the SAIWG has is: What is the exact reason for changing the definition?</p> <p><b>TC Comment 2.</b> Will the definition be solely for internal DOD use, or will it be the definition that the DOD will use for other external discussions revolving around SA/LW (i.e. treaty negotiations)?</p> <p><b>TC Comment 3.</b> Although it is noted that there is no single agreed upon definition for SA/LW, the most widely used definition is the 1997 UN Group of Government Experts definition of SA/LW which includes separate categories for "revolvers and self-loading pistols," "rifles and carbines," and "assault rifles."</p> <p><b>TC Comment 4.</b> Another concern we have is with the mention of a 200 pound weight limit for light weapons. The SAIWG is unaware of any definition or agreement which uses this weight limit in determining whether a weapon is considered a small arm or light weapon. There may be certain weapons, such as MANPADS, which may weigh over 200 pounds but would still be considered a light weapon. We suggest deletion of the 200 pound weight limit.</p> <p><b>Comment 5.</b> The ATF representative who was present at the SAIWG also expressed concern that the change in the DOD definition would vary from the definition provided in U.S. law. Although not directly related to the DOD, the U.S. firearm industry would be watchful of any change relating to the definition of SA/LW and would be concerned of any future impacts this may have on the industry.</p>	<p><b>TC Comments 1 and 3:</b> JSACG chair noted that comments 1 and 3 are directed at the change from the definition staffed by PDC 134A to delete “revolvers and self-loading pistols” in favor of “handguns” and to delete “assault rifles” from the definition. The definition published in the UN Instrument (reference 3.d.) was closely aligned with the PDC 134A definition.</p> <p><b>“Revolvers and self-loading pistols” vs. “handguns”:</b> The JSACG noted that DOD tracks single shot pistols which are not revolvers or self-loading pistols. The term “handgun” was deemed more inclusive and the JSACG did not believe it conflicted with the UN Instrument definition which cites “revolvers and self-loading pistols”.</p> <p>A definition for “handguns” was also added to MILSTRAP/DLMS and that definition includes single-shot pistols, revolvers, semi-automatic pistols, and fully automatic, or machine pistols.</p> <p><b>Assault Rifles:</b> JSACG concluded that assault rifles are covered under rifles, and should not be separately identified as there is no specific definition for assault rifle and it means different things to different interested parties.</p> <p><b>TC Comment 2:</b> As noted in PDC 134A/ADC 220, the DLMS/MILSTRAP SA/LW definition is intended to clarify and define small arms and light weapons for <u>DOD tracking and reporting requirements</u>. The DODSASP was not created nor designed to be used as a tool for tracking DOD weapons for the international community in order to be in compliance with international treaties; however, the information in the DOD Registry may be useful to assist in these obligations. JSACG agreed it would be beneficial to align the definitions where possible.</p> <p><b>TC Comment 4:</b> JSACG agreed to eliminate the 200 pound weight restriction in favor of language in the UN instrument as follows:  <i>“Light weapons are broadly categorized as those weapons <del>weighing less than 200 pounds that are carried and used by several</del> designed for use by two or three members of armed or security forces serving as a crew, although some may be used by a single person.”</i></p> <p><b>TC Comment 5:</b> JSACG noted the DODSASP definition is not tied to US law, and is an internal DOD definition applying to DOD tracking and reporting requirements.</p>

	<b>Draft ADC 220 RESPONSE</b>	<b>DISPOSITION</b>
DUSD (AT&L)TC Con't	<p><b>TC Comment 6.</b> Finally, it appears that our two groups need to have more continuity. While your group includes expert folks from the Army, it does not include anyone from the Army staff. I'd suggest adding [specific SAIWG members] to your group. They both attend the SAIWG and are instrumental in implementing our Small Arms Agreements and Treaties. Army SAIWG member plans on talking to the Army LOGSA and/or Executive Agent for Small Arms logistics JSACG members about the definition, but at this time, the SAIWG has reservations about making a definitional change</p>	<p><b>TC Comment 6:</b> JSACG and SA/LW IWG chair agreed there should be communication between both groups, and the Services should be aware of their corresponding group members. JSACG chair suggested chairs exchange group member names to alert JSACG and SAIWG of their Service counterparts with goal of opening communication lines if not already present.</p> <p>Regarding adding specific Service SA/LW IWG representatives to the JSACG, it is the JSACG Component representative's prerogative to bring additional representatives to the meetings.</p> <p>If the JSACG member requests, JSACG chair can add additional Service parties as interested parties to the JSACG membership list and email distribution.</p>
Army SAIWG member Nonproliferation Policy Suggestions	<p><b><u>Army Nonproliferation Policy Office Suggestions</u></b></p> <p>1. I suggest making the 'carry and use' language as identical as possible for small arms and light weapons, i.e. mention that small arms are intended to be carried and used by an individual, while SALW are intended to be carried and used by a crew.</p> <p>2. I suggest using the term 'weapon systems', rather than just weapons. As per JP 1-02 (2001 edition), the term weapon system includes everything required for employment, and I believe that the term more accurately reflects what the definition is trying to capture. For example, in some cases the weapon may require one soldier to operate, but the 'weapon system' necessitates and assistant to carry ammunition, etc.</p> <p>3. I also agree that if weight is to be mentioned, that loaded or unloaded weight should be specified. For SALW, much of the weight is in the ammunition. I personally recommend using an unloaded weight figure.</p>	<p><b>Comment 1:</b> Concur. JSACG revised definition as noted in disposition for Treaty Compliance Office, comment 4 above.</p> <p><b>Comment 2:</b> Nonconcur. The term "weapon system" is mainly associated with larger and more sophisticated weapons. The weapons defined in the PDC are designed to incorporate weapons that are predominately used by a single person or a group that is limited to two or three persons.</p> <p>Reference: The Encyclopedia Britannica defines "weapon systems" as any integrated system, usually computerized, for the control and operation of weapons of a particular kind. Intercontinental ballistic missiles, long-range bombers, and antiballistic missiles are the weaponry of the strategic weapons system (<i>q.v.</i>). Guided missiles operating at shorter range, <i>e.g.</i>, anti-aircraft or battlefield weapons and air-to-air or air-to-surface attack-type missiles, constitute a tactical weapons system (<i>q.v.</i>).</p> <p>Army LOGSA JSACG representative noted that the term weapon system would be too inclusive (tripods [they do have serial numbers], silencers, and other items) and would add confusion where none is needed.</p> <p><b>Comment 3:</b> Weight limit removed in response to Treaty Compliance (TC) Office, comment 4 above.</p>

	<b>Draft ADC 220 RESPONSE</b>	<b>DISPOSITION</b>
<b>USA Weapons Support Group</b>	<p>Recommend that the Small Arms and Light Weapons Implementation Working Group select a small arms definition that is consistent with the below definitions:</p> <p>DOD 4160.21-M-1, Demilitarization Manual: All non-automatic, semiautomatic, automatic and other weapons up to and including 50 caliber (12.7 mm) including combat shotguns, shoulder fired grenade launchers, man portable rocket launchers, individually operated weapons which are portable and/or can be fired without special mounts or firing devices, pyrotechnic pistols and other ground signal projectors, rifle grenade launchers, and firearms or other weapons having a special military application (e.g., insurgency-counterinsurgency and close assault weapons systems), regardless of caliber.</p> <p>DOD 5100.76-M, Physical Security of Sensitive Conventional Arms, Ammunition, and Explosives: Light automatic weapons up to and including .50 caliber and 40mm MK 19 machine guns, shoulder-fired weapons not fully automatic, handguns, flame throwers, mortar tubes up to and including 81mm, grenade launchers, recoilless rifles up to and including 106mm and rocket and missile launchers with an unpacked weight of 100 pounds.</p>	<p>Definitions provided are noted.</p> <p>The DLA JSACG representative agreed to provide a copy of ADC 220 to the proponent for DOD 4160.21-M-1 which is a DLA office.</p> <p>JSACG chair will determine the proponent office for DOD 5100.76-M and provide them a copy of ADC 220.</p>
<b>DLA SYSTEMS INTEGRATION OFFICE (DSIO)</b>	<p>As far as the definition for small arms, I feel we are splitting hairs and as firepower continues to evolve the definition will continue to change with it. Therefore, we will live with the current definition rather than attempt to add to it or detract from it.</p> <p>I noticed one typo that I highlighted in blue. Page one of six in the attachment.</p> <p>I am concerned about the visibility and traceability of captured small arms and the procedures for the reporting of them. The current version of MILSTRAP provides the following data when entering the serial number while creating a DSM image. Enter serial number. Right justify and fill unused positions with zeros. If the serial number begins with a zero, also enter a 12-zone in the zero position which starts the serial number. A 12 equates to an ampersand (&amp;). Furthermore, an (*) asterisk is used to identify foreign or unidentifiable characters in the serial number field. Within the DLMS transactions the special characters are not valid. The * is used as a field separator. As of January 2007, DLA is moving into the realm of IUID within the small arms community. Within IUID, the (/) slash and (-) dash are the only valid special characters. Currently DLA records indicate that a (,) comma is also recorded as a valid character within a weapons serial number. Realizing that this ADC is not to provide functionality or procedures, the need for these conditions to be addressed in the supporting regulatory guidance is a real concern for this activity in light of world situations.</p>	<p>As indicated in the PDC Description of Change, "The purpose of this change is to support the changing environment for maintaining visibility and reporting of small arms and light weapons (SA/LW) serial number data within DOD. This change recognizes that there is not yet an internationally nor DOD agreed definition of small arms and light weapons." Therefore, the JSACG and SAIWG will continue to be proactive and monitor the definitions as necessary.</p> <p>Typo corrected.</p> <p>The remaining DSIO comments address an issue with the serial number format not specific to the PDC/ADC to revise the small arms definition. As such they will be addressed separately from ADC 220.</p>

## ENCLOSURE 3: PDC 244 COMMENT DISPOSITION

	PDC 244 COMMENT	DISPOSITION
<p><b>USMC SPRC representative</b></p>	<p>NWSC Crane, Indiana maintains the Marine Corps Registry and are responsible for updating the DOD Registry for small arms and light weapons owned by this Service Component. Their system is not currently automated, so the annual reconciliation and periodic updates are conducted using a by unit asset listing. They (Crane) then update the DOD registry. NWSC, Crane, is in the process of updating their website to ease the paper shuffle and allow for digital signature. However, it still won't allow for supply transactions to be run at the unit level. The ability to induct supply transactions to update the Marine Corps and DOD Registries will be part of a future update in GCSS-MC. GCSS-MC (block 1) is scheduled for IOC 2<sup>nd</sup> quarter of FY-08. We (Marine Corps) do not have a firm timeframe on when that will happen.</p> <p>With that said, the Yellow Highlighted statements in PDC 244 are required to support the Marine Corps current process for reconciliation of small arms and light weapons and updating the DOD Registry.</p>	<p>Noted. USMC comment relates to the use of listings which the JSACG Chair had highlighted in PDC 244 for possible deletion if not being used. USMC response and JSACG discussion at the 4/25/07 meeting verified that there was still a requirement for the use of listings by some Components during annual reconciliation. Accordingly, that portion of the procedures will not be revised by this change.</p> <p>Specific text being addressed in MILSTRAP subparagraphs C12.5.2.10. and C12.7.8. follows: "The method of performing the reconciliation will depend on the DOD Components' capability of utilizing DISN/NIPRNET transactions or listings. When listings are used to perform the annual reconciliation, identify them by the appropriate transaction DI code either as header information or reflected with each line entry"</p>
<p><b>DLA SPRC and JSACG representatives</b></p>	<p><b>DLA concurs with PDC 244,</b> and also had the following comments which were addressed at the 4/25/07 JSACG meeting:</p> <p>Regarding PDC 244. There is a concern that DDC brought up in regards to whether LOGSA will be able to handle the volume of transactions.</p> <p>In paragraph 2 comments below, I suggest that we request that all use the same transactions, which in this case would be the DSR-E.</p>	<p>As discussed at the JSACG meeting, LOGSA does not believe the USAF/DLA annual reconciliation will impact LOGSA. LOGSA further noted that the volume being addressed in the USAF/DLA reconciliation would not negatively impact LOGSA if they were involved.</p> <p>Under current procedures, either listings or transactions may be used for the annual small arms reconciliation depending on Component capabilities.</p>
<p><b>DLA DDC</b></p>	<p>DDC J3/J4-TP has reviewed PDC 244, and the following comments and/or concerns were raised:</p> <ol style="list-style-type: none"> <li>1. C12.5.2.10. - An actual annual reconciliation between DDAA and USAF has never been accomplished. However, what has been attempted is that DLA has provided NIINs/Weapon Serial Numbers via e-mail listings for USAF to attempt to synchronize their records with the records on file at DDAA.</li> <li>2. C12.7.8. - Attempts to explain the Bottoms Up Recon process with U.S. Air Force at Warner Robbins and Wright Patterson AFB have failed. The Air Force, rather than performing reconciliation, does a file overlay with the DOD Central Registry to bring records into sync. However, with DDAA, it has been by DLA providing an email of NIIN/WSN with a pre discussed condition that the email would contain either shipments or receipts. Air Force would then attempt to adjust their records to match DLA. AF does not use a DSR-E transaction to accomplish this process.</li> <li>3. The volume that would be generated would overload LOGSA.</li> </ol>	<p>JSACG chair notes these comments do not impact PDC 244 specifically, but are addressed to the current effort for small arms reconciliation between USAF and DLA at Defense Distribution Depot Anniston Alabama (DDAA).</p> <p>The USAF/DLA reconciliation effort is ongoing with all parties working closely to resolve the issues.</p> <p>Disposition as noted in disposition to DLA SPRC comment above regarding LOGSA and volume.</p>

	<b>PDC 244 COMMENT</b>	<b>DISPOSITION</b>
<b>USA JSACG</b>	JSACG meeting participants from LOGSA and Army Executive Agent for Small Arms concurred with PDC 244 at the JSACG meeting	Noted.
<b>USN JSACG</b> Alternate providing comments for the <b>USMC, USN and USCG Small Arms Registries</b>	<p><b>COMMENTS PROVIDED SUBSEQUENT O MEETING:</b></p> <p><b>USMC</b> USMC response given by USMC Supply PRC representative is concurred with by USMC Small Arms Registry. It is important to understand about USMC SPRC comment - which was further stated by USMC JSACG alternate [at the JSACG meeting], that the USMC units report all movement to the USMC Small Arms Registry. Whether the units utilize the data from the web site or a valid Annual Reconciliation Report obtained by website or mail from NSWC Crane, the only data on that is what has been provided to the USMC Small Arms Registry.</p> <p>The new wording or changes proposed are fine and have no bearing upon the work currently done in support of the USMC Small Arms reporting and annual asset verification. USMC regs further require tighter data than at the DOD level, so not only are we complying with these requirements but meet an even stricter set of regs.</p> <hr/> <p><b>USN:</b> USN response is herein given by an alternate Navy member of the JSACG. We are fully cognizant of the differences between the physical inventory/custody and the asset accountability and the annual reconciliation as we manage the USN Small Arms Registry. We are in close working relationship with the Navy units authorized to hold Navy small arms. They report receipts of small arms and shipments of small arms to the USN Small Arms Registry. In turn we keep them apprised of any open shipments, etc. via their access to our web site (as we also provide the USMC). This work always requires the record of the unit before any action is taken on the Small Arms Registry.</p> <p>The new wording or changes proposed are fine and have no bearing/require no change to the work currently done in support of the USN Small Arms reporting and annual asset verification. We also must comply with the Navy Reg, the NAVSEA INSTRUCTION 8370.2a, an even stricter interpretation and regulation.</p> <hr/> <p><b>USCG:</b> USCG directs NSWC Crane to manage their required USCG Small Arms Registry. The USCG records are what are utilized to comprise the USCG Small Arms Registry record. The Registry works closely with the Coast Guard Units and a very stringent set of records is maintained.</p> <p>The new wording or changes proposed are fine and have no bearing/require no change to the work currently done in support of the USCG Small Arms reporting and annual asset verification.</p> <hr/> <p>The USMC and USN Small Arms Registries are moving to on-line interactive reporting capability. By the time of the 2008 JSACG meeting, this should be a reality.</p>	<p><b>FOLLOWING COMMENTS ARE NOTED:</b></p>



DEPARTMENT OF THE ARMY  
OFFICE OF THE JUDGE ADVOCATE GENERAL  
2200 ARMY PENTAGON  
WASHINGTON, DC 20310-2200



REPLY TO  
ATTENTION OF

DAJA-AL 1994/0916 (27-1a)

24 June 1994

MEMORANDUM FOR DEPUTY CHIEF OF STAFF LOGISTICS, ATTN: LOEA-OS,  
500 ARMY PENTAGON, WASHINGTON DC 20310-0500

SUBJECT: Statutory Requirements for Unique Item Tracking

1. This responds to your request for a legal opinion concerning the statutory and regulatory requirements for unique item tracking (Enclosure 1). Informal coordination with your office revealed that the focus of your request is whether there is a statutory basis for DOD policy concerning the tracking of unique items. A review of pertinent law and regulations reveals that the requirement for a "cradle-to-grave" transaction history for certain types of weapons is not required by statute, but is a DOD policy created in a response to the Gun Control Act of 1968 (18 U.S.C. section 921 et seq.).

2. In your forwarding memorandum, you cited the Gun Control Act of 1968 as possible authority for the above-mentioned requirement. It is not. As stated in an ODCSLOG Information Paper you provided this office, the Gun Control Act of 1968 was enacted to provide support to Federal, State, and local law enforcement officials in their fight against crime (Enclosure 2). To do so, the Act places controls on the interstate and foreign commerce of firearms, making certain actions unlawful and requiring importers, manufacturers, and dealers in firearms or ammunition to be licensed by the Secretary of the Treasury or his delegate. Informal coordination with the proponent of DOD 4140.1-R (Mr. Frank St. Mark) revealed that DOD created the Small Arms Serialization Program as a policy response to this statute, not because the Gun Control Act of 1968 required it. This office could find no statutory authority that mandated the unique item tracking required by DOD. Thus, it appears that the DOD policy for unique item tracking was intended to better control unique items, to include small arms, for which DOD is responsible.

FOR THE JUDGE ADVOCATE GENERAL:

*Stephanie C. Spahn*  
STEPHANIE C. SPAHN  
MAJ, JA  
Acting Chief, General Law Branch  
Administrative Law Division

Enclosure 4