

RE: Comment on FR Doc # 2023-19177

Dear Helen Koppe and the Bureau of Alcohol, Tobacco, Firearms, and Explosives,

Thank you for the opportunity to comment on the proposed rule for ATF 2022R-17. I am a public policy and civic engagement researcher at the University of Illinois at Chicago, the Institute for Policy and Civic Engagement. My recent work involved data support for the Office of Firearms Violence Prevention at the State of Illinois and the Independent Monitoring Team that oversees constitutional police reform for the Chicago Police Department.

I support the effort by the proposed rule to clarify the definition of “engaged in business” with the aim of moving closer to a policy of universal background checks on gun sales from dealers.

I would caution, however, that this rule alone does not ensure safer, less violent communities. Much of the firearm violence in urban areas is carried out by illegally obtained weapons, the exchange of which this rule would not be able to stop¹. Outside of gang-related firearm violence, many of the perpetrators in recent mass shootings have been able to pass a background check or have had access to firearms in their homes². While this evidence does not warrant my opposing this rule, it causes me to assess it as less of an impactful measure for reducing gun violence and more of a successful one for increasing tax revenue from gun sales. I instead urge the administration to place greater focus on 1) stopping illegal firearms from circulating and 2) expanding community mental health support services and domestic violence support services.

The gun violence epidemic through which we are now living is complicated and requires coordinated efforts between government, law enforcement agencies, and the public. We need greater attention to creating an infrastructure that facilitates collaboration, data sharing, and trust between these actors.

Sincerely,

Ana Genkova, PhD

University of Illinois Chicago

¹ Roberto, E., Braga, A. A., & Papachristos, A. V. (2018). [Closer to guns: the role of street gangs in facilitating access to illegal firearms](https://pubmed.ncbi.nlm.nih.gov/29744717/). *Journal of urban health*, 95, 372-382. <https://pubmed.ncbi.nlm.nih.gov/29744717/>

² Doherty, E., (2023). Mass shooter acquire guns legally. *Axios*. <https://www.axios.com/2023/03/28/mass-shooting-nashville-guns-legally>