



August 6, 2026

By electronic submission to <https://www.regulations.gov>.

ATF Rulemaking Comments
Mail Stop 6N-518, Office of Regulatory Affairs
Enforcement Programs and Services
Bureau of Alcohol, Tobacco, Firearms and Explosives
99 New York Ave. NE
Washington, DC 20226

Re: Docket No. ATF-2026-0166; RIN 1140-AA87
Comment on Proposed Rule on “Removing Youth Handgun Safety Act Notice”

To Whom It May Concern:

Everytown for Gun Safety Support Fund¹ (“Everytown”) submits this comment in response to the notice of proposed rulemaking (“NPRM” or “proposed rule”) published by the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) eliminating regulations regarding the Youth Handgun Safety Act (“Act”). The proposed rule would end the long-running public awareness campaign directing federal firearms licensees (“FFLs”) who sell handguns to post signs and provide written notice about the Act’s requirements to handgun purchasers.

At a time when firearms are the leading cause of death for children and teens in our country,² ATF should not eliminate the longstanding requirement that gun dealers provide customers with written warnings created to help prevent children and teenagers from illegally accessing handguns and hurting themselves or others.

1. Guns kill and injure thousands of U.S. children and teens each year.

Each year, more than 4,400 children and teens are killed and more than 17,000 are injured by gunfire in the United States. In other words, 60 children and teens are shot every day

¹ Everytown for Gun Safety Support Fund is the education, research and litigation arm of Everytown for Gun Safety, the largest gun violence prevention organization in the country with nearly 11 million supporters and more than 700,000 donors. The Everytown Support Fund seeks to improve our understanding of the causes of gun violence and help to reduce it by conducting groundbreaking original research, developing evidence-based policies, communicating this knowledge to the American public, and advancing gun safety and gun violence prevention in communities and the courts.

² See Everytown, “The Impact of Gun Violence on Children and Teens,” last updated Jan. 16, 2026, *available at* <https://everytownresearch.org/report/the-impact-of-gun-violence-on-children-and-teens/>, citing Centers for Disease Control and Prevention, National Center for Health Statistics. WONDER Online Database, Provisional Mortality Statistics, Multiple Cause of Death, Injury Mechanism & All Other Leading Causes, (accessed December 16, 2025). Data from 2024. Ages: 1–19.

on average.³ Firearms are the leading cause of death for children and teens in the United States, and have been since 2020.⁴ In fact, U.S. children aged 5 to 14 are 21 times more likely to be killed with guns than children in other high-income countries.⁵

Approximately 29 percent of child and teen gun deaths are suicides — nearly 1,300 per year.⁶ Firearm suicide among children and teens has been rising dramatically, increasing by 21 percent over the past decade.⁷ For children, teens, and people of all ages, having access to a gun increases the risk of death by suicide by three times.⁸ Yet research shows that an estimated 6.7 million children in the U.S. live in homes with at least one gun that is loaded and unlocked.⁹ The combination of suicidal ideation and easy firearm access can be lethal. When children under age 18 die by gun suicide, they are likely to have used a gun they found at home: Nearly 80 percent of child gun suicides involved a gun belonging to a parent or relative.¹⁰

Additionally, every year hundreds of children in the United States unintentionally shoot themselves or someone else after gaining access to a loaded firearm. An Everytown report analyzing more than 3,500 incidents between 2015 and 2024 in which children under age 18 unintentionally shot themselves or others found that such incidents occur on average 360 times per year, with one in three unintentional shooters being preschoolers.¹¹ Most of these unintentional child shootings — more than 7 in 10 — occur in or around homes.¹² Everytown's report found that among unintentional shootings by children where details have been reported about the type of gun used, handguns accounted for the great majority of such shootings (86 percent).¹³

³ See *id.*, citing Everytown Research analysis of Centers for Disease Control and Prevention, National Center for Health Statistics, WONDER Online Database, Provisional Mortality Statistics, Multiple Cause of Death (accessed December 16, 2025). Average: 2020 to 2024; Everytown Research analysis of 2020 HCUP nonfatal injury data. Ages: 0–19.

⁴ Annette Choi, “Children and teens are more likely to die by guns than anything else,” CNN, May 15, 2025, available at <https://www.cnn.com/health/guns-death-us-children-teens-dg>.

⁵ Grinshteyn E., Hemenway D. “Violent death rates in the US compared to those of the other high-income countries, 2015.” *Prev. Med.* 2019 Jun;123:20-26, available at <https://pubmed.ncbi.nlm.nih.gov/30817955/>.

⁶ Everytown Research analysis of Centers for Disease Control and Prevention, National Center for Health Statistics, WONDER Online Database, Provisional Mortality Statistics, Multiple Cause of Death (accessed December 16, 2025). Average: 2020 to 2024. Ages: 0–19.

⁷ Everytown Research analysis of Centers for Disease Control and Prevention, National Center for Health Statistics, WONDER Online Database, Final Mortality Statistics, Underlying Cause of Death, 2015 and Provisional Mortality Statistics, Multiple Cause of Death, 2024 (accessed December 16, 2025). Rate percent change: 2015 vs. 2024. Ages: 0–19.

⁸ Andrew Anglemyer, Tara Horvath, and George Rutherford, “The Accessibility of Firearms and Risk for Suicide and Homicide Victimization Among Household Members: A Systematic Review and Meta-Analysis,” *Annals of Internal Medicine* 160, no. 2 (2014): 101–10, available at <https://doi.org/10.7326/M13-1301>.

⁹ Matthew Miller *et al.*, “Firearm Storage in Households With Children,” *JAMA Network Open* 9, no. 5 (2026): e2612191, available at <https://doi.org/10.1001/jamanetworkopen.2026.12191>.

¹⁰ Catherine Barber *et al.*, “Who Owned the Gun in Firearm Suicides of Men, Women, and Youth in Five US States?” *Prev. Med.* 164 (2022): 107066, available at <https://doi.org/10.1016/j.ypmed.2022.107066>.

¹¹ Everytown, “Ten Years of Preventable Tragedies: Findings from the #NotAnAccident Index of Unintentional Shootings by Children,” last updated June 30, 2025, available at <https://everytownresearch.org/report/notanaccident>.

¹² *Id.*

¹³ *Id.*

2. The Youth Handgun Safety Act and its implementing regulation seek to reduce gun deaths of children and teens.

Enacted in 1994, the Youth Handgun Safety Act seeks to help prevent and reduce youth gun deaths and shootings by prohibiting anyone under the age of 18 from knowingly possessing a handgun and by prohibiting selling or transferring a handgun or handgun ammunition to anyone under 18.¹⁴ In 1998, as part of an effort to implement the Act and make sure handgun purchasers are familiar with its provisions,¹⁵ ATF issued a rule requiring that gun dealers post a sign informing customers about the Act's provisions as well as provide written notice with each handgun sold, which is usually a pamphlet tucked inside the gun's case.¹⁶ The sign and pamphlet warn gun buyers that "[t]he misuse of handguns is a leading contributor to juvenile violence and fatalities" and that "[s]afely storing and securing firearms away from children will help prevent the unlawful possession of handguns by juveniles, stop accidents, and save lives."¹⁷ A copy of the sign is shown below:



Youth Handgun Safety Act

ATF

- (1) The misuse of handguns is a leading contributor to juvenile violence and fatalities.**
- (2) Safely storing and securing firearms away from children will help prevent the unlawful possession of handguns by juveniles, stop accidents, and save lives.**
- (3) Federal law prohibits, except in certain limited circumstances, anyone under 18 years of age from knowingly possessing a handgun, or any person from selling, delivering, or otherwise transferring a handgun to a person under 18.**
- (4) A knowing violation of the prohibition against selling, delivering, or otherwise transferring a handgun to a person under the age of 18 is, under certain circumstances, punishable by up to 10 years in prison.**

¹⁴ 18 U.S.C. § 922(x). There are limited exceptions to the Act's prohibitions.

¹⁵ Note that the NPRM misleadingly states that the "original impetus for providing a warning or notice was to 'advise handgun purchasers of the still relatively new requirements of the YHSA.'" 91 Fed. Reg. 25188. This quote in the NPRM which frames the impetus as being linked to the "relatively new" YHSA is attributed to a comment letter submitted by the National Rifle Association. The actual impetus for the 1998 rule came from the 1997 "Memorandum on Enforcing the Youth Handgun Safety Act" directing the Secretary of the Treasury to enforce the YHSA's provisions and "promptly publish in the Federal Register proposed regulations requiring that signs be posted on the premises of FFLs and that written notification be issued with each handgun sold to non-licensees...." See Administration of William J. Clinton, "Memorandum on Enforcing the Youth Handgun Safety Act," 33 Weekly Comp. Pres. Doc 856 (June 11, 1997), available at <https://www.presidency.ucsb.edu/documents/memorandum-enforcing-the-youth-handgun-safety-act>. There is nothing in the 1997 memorandum indicating that the impetus for requiring signs and notifications was linked to the YHSA's requirements being "new" or that the signs and notifications should be temporary to get people familiar with a new law.

¹⁶ 63 Fed. Reg. 37740. ATF's most recent version of the pamphlet, updated in March 2026, is available at <https://www.atf.gov/media/25251/download>.

¹⁷ 27 C.F.R. § 478.103(b).

ATF estimates that the costs incurred by an FFL to post signs and provide purchasers with notice are minimal: an estimated \$16 per FFL per year.¹⁸ However, this estimate appears inaccurate and misleading, as ATF itself provides and ships Youth Handgun Safety Act pamphlets and signs to FFLs free of charge through its website.¹⁹ ATF's online ordering form provides no limits for the number of pamphlets and signs FFLs can request and does not indicate that any payment for these items is required.

3. ATF's proposal to eliminate Youth Handgun Safety Act notifications would end an important public awareness campaign that helps reduce child access to handguns and prevent child shootings.

With this NPRM, ATF proposes to rescind 27 C.F.R. § 478.103, the regulation that since 1998 has directed FFLs to post Youth Handgun Safety Act signs and provide notices to purchasers. Even though shootings have been the leading cause of death for children and teens for years, ATF claims that it "reevaluated the costs and benefits of the 1998 final rule and has concluded that the 1998 final rule's required written notices and displays place an undue burden on FFLs."²⁰ Because of its concern for the burden the Act places on FFLs, ATF proposes to completely eliminate the regulation providing for signs and notices under the Act.

However, the burdens that ATF claims the 1998 rule places on FFLs are minimal to the point of being almost trivial. In the NPRM, ATF estimates the annual cost of the current regulation at an average of \$16 per FFL, meaning that rescinding the rule would provide an FFL savings equivalent to the price of one box of 9mm ammunition.²¹ As mentioned, this estimate appears misleading, as ATF itself provides such pamphlets and signs to FFLs free of charge. But even if FFLs did incur these costs, even aggregating such savings across all FFLs in the country would produce an annualized industry savings of only \$794,272 per year.²² By way of comparison, an Everytown analysis has found that each gun death in the United States costs taxpayers an average of \$273,904,²³ meaning that if Youth Handgun Safety Act notices prevent just three gun deaths per year, the saved economic costs exceed the annual cost of the notices for all FFLs — which, of course, cannot be compared to the benefits of children's lives saved. Given this context, it diminishes ATF's credibility for ATF to call the burden that the current regulation places on FFLs "undue."

ATF's NPRM also ignores obvious costs that would come with ending the Act's public awareness campaign that helps reduce juvenile handgun access and promote safe handgun storage. ATF provides only cursory analysis of the costs of ending Youth Handgun Safety Act notices, saying that "those costs could only relate to the risk that the public might not be informed of existing requirements not to deliver or transfer firearms to juveniles."²⁴ ATF further

¹⁸ 91 Fed. Reg. 25190.

¹⁹ See <https://www.atf.gov/resource-center/forms/distribution-center-order-form>.

²⁰ 91 Fed. Reg. 25188.

²¹ 91 Fed. Reg. 25190.

²² *Id.*

²³ Everytown report, "The Economic Cost of Gun Violence," July 19, 2022, available at <https://everytownresearch.org/report/the-economic-cost-of-gun-violence/>.

²⁴ 91 Fed. Reg. 25190.

states that if the sign and notice requirements are rescinded, the risk that the public might not be informed of the Act's requirements is "de minimis" because the Act is published in the U.S. Code and because its prohibition on sales to juveniles have existed for 30 years "during which time all purchasers have been notified consistently."²⁵

ATF provides no evidence to support such an assertion, and ATF's explanation overlooks the obvious fact that many gun purchasers are not actually aware of the Act's requirements, perhaps because they are first-time purchasers or perhaps because they have not read the U.S. Code. The Act's required signs and notices help make sure that new generations of purchasers are informed about the prohibition on youth handgun sales and about the importance of securing handguns against child access.²⁶ Additionally, gun purchasers who have become parents may not have considered changing the firearm storage habits that they had used before they had children in their house, but the Act's notices may help remind them of the importance of securing firearms in the home from child access.²⁷ And FFL staff may benefit from the reminder that the signs and notices give them to make sure they are not selling handguns or handgun ammunition to buyers who are juveniles or who may indicate an intent to transfer a purchased handgun to a juvenile in violation of the Act. In such ways, the educational value that the Act's signs and notices provide regarding the importance of securing handguns and keeping them out of children's hands helps prevent youth shooting deaths, including suicides and unintentional shootings. These benefits would be lost if ATF finalizes its proposal to rescind the current regulation.

In short, the current Youth Handgun Safety Act regulation helps save lives by promoting awareness about the dangers of child handgun access, yet ATF's analysis of the costs of its proposed elimination of the current regulation does not even take the life-saving benefits of the Act's signs and notices into account. ATF appears so focused on reducing essentially nonexistent burdens on FFLs that it overlooks the value of this important measure that helps promote awareness of and compliance with the law and that helps advise handgun purchasers on how they can help keep children safe.

4. Conclusion

A credible cost-benefit analysis of ATF's NPRM would find that the benefits of the Youth Handgun Safety Act's public awareness campaign easily justify the stated \$16 per year cost to FFLs, but ATF did not conduct such a credible analysis. Further, the analysis completely ignores the fact that ATF prints and ships the required materials to FFLs for free. The signs and notices required by 27 C.F.R. § 478.103 inform purchasers of the importance of preventing child access

²⁵ *Id.*

²⁶ According to the National Shooting Sports Foundation (NSSF), there have been over 26 million new first-time gun owners since 2020. See NSSF, "Update: Make that 26.2 Million New First-Time Gun Owners Since 2020," Jan. 13, 2025, available at <https://www.nssf.org/articles/update-make-that-26-million-new-first-time-gun-owners-since-2020/>.

²⁷ When Director Cekada was asked during his confirmation process if he believed firearms "should be stored securely, preventing unauthorized access by minors and others," he answered: "The statistics regarding children and unsecured firearms are truly heartbreaking.... Americans have the duty to exercise their rights responsibly. One way to do that is to make sure that unattended loaded firearms are securely locked away from unauthorized persons." See Robert Cekada, Responses to Questions for the Record, S. Comm. on the Judiciary Hearing (Feb. 2026), response to Senator Blumenthal question 6.a, available at https://www.judiciary.senate.gov/imo/media/doc/3502d997-daa5-f550-7914-e7d18cc5b59b/2026-02-04_QFR-Responses_Cekada.pdf.

to handguns and, in doing so, help prevent violations of the Act's prohibitions on youth firearm access. These notices and signs are particularly important for first-time purchasers and those who may be purchasing handguns for the first time since becoming parents. ATF should prioritize reducing child access to handguns and saving children from being shot over providing a mere \$16 in annual savings per FFL. Accordingly, we urge ATF to withdraw the proposed rule and preserve the Youth Handgun Safety Act's signs and notices.

Thank you for your consideration of this comment.

Sincerely,

/s/ Justin Wagner

Justin Wagner
Senior Vice President for Law & Policy
Everytown for Gun Safety Support Fund