

ELECTRONIC 4473 STORAGE FAQ

Answers and explanations
to FAQs about recent ATF
Ruling 2022-1 and Bravo's
E4473 Cloud Storage



What is ATF Ruling 2022-1?

"ATF ruling 2022-1, signed August 17, 2022, authorizes FFLs to retain an electronic version of each ATF Form 4473 created pursuant to ATF Ruling 2016-2 (or subsequent ruling), instead of the paper format, provided the conditions set forth in this ruling are met.

Additionally, ATF authorizes digital scanning and electronic retention of paper ATF Form 4473 more than 3 years old, provided the conditions set forth in this ruling are met. This ruling clarifies that FFLs who use an e-Form 4473, instead of the paper format, may retain the form electronically.

Any questions should be sent to FIPB@atf.gov."



Do I need to apply for a variance with the ATF to use an electronic storage solution for form 4473?

No. Per the ATF ruling, a business does not need to submit a variance to store 4473's electronically.

However, the FFL must provide written notification to their local ATF Industry Operations Area Office 60 days prior to implementing the use of electronic storage.



Do I need to wait for the ATF to issue an approval after I've submitted my 60-day written notification prior to implementing the use of electronic storage?

No. The ATF will not issue an approval or denial. The ruling states only that a business must provide written notification 60 days before starting to use electronic 4473 storage.



If I submit my 60-day notification, am I required to begin use of electronic 4473 storage after I meet my 60-day notice period?

No. Your 60-day notification alerts your local IOI Office that you intend to use electronic 4473 storage but does not require that you do so.



What needs to be done before I can use Bravo E4473 Cloud Storage?

- ✓ Submit your written notification immediately to your local ATF Industry Operations Area Office to begin your 60-day notice period.
- ✓ Sign up for E4473 Cloud Storage.
- ✓ Notify Bravo Support once you Submit your written notification. Once your 60-day notice period has expired Bravo will enable E4473 Cloud Storage and you can begin using. You will be billed at this time.
- 📎 If you've already notified your local ATF Industry Operations Area Office about your intent to use electronic storage for 4473s and you've fulfilled your 60-day notice period, you can begin using Cloud Storage immediately once you're signed up.



Do you have a template I can use for my 60-day notification?

Yes. Use the message below when submitting notice to your ATF Industry Operations Area Office.

To whom this may concern:

In accordance with ATF electronic storage approval conditions [*INSERT BUSINESS NAME HERE*] is providing the required 60-day written notification of our intent to use the digital form 4473 storage system.

Business Name: [*INSERT BUSINESS NAME HERE*]

Business Address: [*INSERT BUSINESS ADDRESS HERE*]

FFL: [*INSERT FFL # HERE*]