



STURM, RUGER & Company, Inc.

Southport, Connecticut 06890 U.S.A.

ALL RUGER FIREARMS ARE DESIGNED AND MANUFACTURED IN OUR OWN FACTORIES IN THE UNITED STATES OF AMERICA

March 16, 2009

Testimony before Senate Judiciary Committee
Committee Bill No. 353

Mr. Chairman and Members of the Committee:

My name is Kevin Reid and I am the Vice President and General Counsel of Sturm, Ruger & Co., Inc., which is headquartered in Southport, Connecticut.

2009 is the 60th anniversary of Sturm, Ruger, which was founded in Southport by William B. Ruger, Sr. way back in 1949. The Company manufactures a full line of quality firearms, including rifles, pistols, shotguns and revolvers.

We strongly oppose Proposed Bill 353, which would mandate the use of microstripping technology on semiautomatic pistols. As I am sure you know, microstripping is a patented, sole-sourced technology that laser-engraves the firearm's make, model and serial number on the tip of the gun's firing pin so that, theoretically, this information will be imprinted on the cartridge case when the gun is fired. Notably, Bill 353 would require these microscopic markings in at least *two* places within the pistol.

Contrary to what proponents of the technology allege, the technology is – at best – unproven. Research from nationally renowned scientists and professionals within the field reveals that microstripping technology is unreliable and does not function as the patent holder claims. For example, experts at the University of California, Davis, recently completed a study and found the technology “flawed,” ultimately recommending *against* implementation of the California mandate to incorporate the technology into semiautomatic handguns. The study noted that “[f]urther testing, analysis and evaluation is required.”

Similarly, an independent, peer-reviewed study of this patented technology published in the *Journal of the Association of Firearms and Toolmarks Examiners* (AFTE) demonstrated that the technology does not produce reliable results. The author of that study, Professor George Krivosta, examined cartridge cases previously imprinted by micro-laser engraved firing pins and found the markings illegible and non-reproducible. Moreover, tests conducted by Professor Krivosta using two other firing pins confirmed that the technology is unreliable. With one pin, the vast majority of markings were never imprinted on the cartridge cases, and those that did were difficult to decipher. With the other pin Professor Krivosta studied, ten separate cartridge cases were required to piece together the information contained on the firing pin. These results stand in stark contrast to the claims of the patent holder.

What is proven and demonstrable, however, is that the technology is easily defeated. The microscopic markings are engraved to a depth of only about 25 microns, which is approximately one-fourth the diameter of the average human hair at 100 microns. Think about that . . . one fourth the diameter of the average human hair. As a result, the markings can be removed in a

matter of seconds using common household tools – a file, an emery board, or sandpaper. Because the amount of material necessary to remove or obliterate the markings is so slight, it can be achieved without any detrimental effect on the function of the firing pin, and therefore the firearm.

As the representative of a firearms manufacturer, I am deeply troubled by the efforts of some proponents of this technology to downplay the impact that implementation will have on the manufacturing process and cost of firearms. In fact, implementing this technology will have a dramatic impact on the manufacture of pistols, including the major redesign of a process. The simple fact is that most firearms parts are interchangeable and typically produced or purchased in bulk; certainly, that is the case with firing pins. Implementation of this technology would require the assembler to mate a particular firing pin with a particular firearms assembly, all based upon markings that he or she cannot observe without the aid of a scanning electron microscope. The difficulty is exacerbated by this particular bill because it requires markings in at least two places. The notion that these difficulties can be cheaply and easily overcome ignores both the reality of the manufacturing process and the burdens implementation would impose.

In effect, this bill seeks to require manufacturers to implement a costly, unproven, sole-source technology, without any demonstrated benefit. Any legislation being considered must always look at both the costs and the benefits of passage. Here, the costs are high and the benefits have yet to be established.

Under the circumstances, we believe this bill should not be allowed to proceed out of this Committee. Rather, we believe that additional study *must* be performed before implementation of this expensive, unproven and unreliable technology should even be seriously considered.

It is highly significant that, in March 2008, the National Research Council (NRC), an arm of the National Academy of Sciences, released a report that expressed deep concerns about this technology. In particular, the study thoughtfully explained “that for such a technology to be implemented successfully, in-depth investigations on several topics are needed . . . [including] . . . the cost implications and feasibility of adding these technologies to established manufacturing processes.”

We at Sturm, Ruger wholeheartedly agree.

Thank you.

A handwritten signature in black ink that reads "Kevin B. Reid, Sr." with a stylized flourish at the end.

Kevin B. Reid, Sr.
Vice President and General Counsel
Sturm, Ruger & Co., Inc.