

**Written Testimony of Bill Napier, LPC**  
**House Rules Subcommittee on Legislative and Budget Process**  
**Wednesday, June 15, 2022**

Chairman Morelle, Ranking Member Burgess, and members of the subcommittee, thank you for the opportunity to testify today and to provide my input and detail my experiences in efforts to combat the thefts of firearms from federally licensed firearms retailers, or FFLs.

My name is Bill Napier, and I have more than two decades of experience as a security analyst and ATF compliance consultant. I have conducted several hundred compliance visits at licensed manufacturers, distribution facilities, and dealers of all shapes and sizes. I have also presented at dozens of conferences, seminars, and webinars to educate those in the industry on the panoply of regulations they must comply with as a condition of their licenses. And lastly, I have over 20 years as a law enforcement officer.

I want to be very clear that the industry takes security very seriously, which is why in 2018, we launched Operation Secure Store—a joint effort with the Bureau of Alcohol, Tobacco and Firearms, that aims to prevent the theft of firearms from federal firearms licensees. I am extremely proud of the work that we have done in cooperation with the ATF, and it is making a difference.

Operation Secure Store promotes public safety by proactively educating FFLs in identifying and quantifying vulnerabilities and risks associated with the business of firearms commerce and industry-related operations as a whole. Specifically, Operation Secure Store has five components: Education and Awareness, Assessment and Risk Analysis, Planning and Strategy, Engagement, and finally, Response. These are outlined on the Operation Secure Store's website.

In the Education and Awareness portion, we educate FFLs to ensure they have an ongoing awareness of potential threats, an understanding of security basics and access to the techniques and solutions that can be effective in protecting their businesses. We partner with the ATF to develop educational programming, including our current and ongoing series of regional security seminars hosted by the ATF.

The Assessment and Risk Analysis is the initial step in identifying the vulnerabilities and weaknesses that could cause an FFL to be more susceptible to a criminal threat or other hazard that could compromise daily operations. Security and risk assessments, a service provided by the industry's trade association, seek to evaluate credible threats and capabilities, identify vulnerabilities, test current controls and assess consequences of a breach. Upon the assessment's completion, gaps in existing controls may be identified and remedies suggested to ensure those areas in need of improvement can be addressed. Additionally, through these assessments, FFLs are afforded the skills and knowledge to conduct ongoing self-assessments that include assessing the potential risks and prioritizing how and when those risks need to be addressed.

Once the Assessment and analysis is completed, we develop a plan and a strategy. This details when, where and how an FFL will develop or modify its security processes and programs as supported by the knowledge gained through the "Assessment and Risk" material, always with the

goal of mitigating risk and deterring potential threats. Strategies will include recommendations for evaluating relevant technologies and other security solutions, while also defining operational controls that can improve risk mitigation.

The last two components of OSS are often overlooked. Community engagement can have a tremendous impact on crime and crime prevention strategies. Active participation and relationship building with local law enforcement, the business community and the community citizens can be critical to protecting a business, and engaging all of these also helps build a beneficial level of trust between the FFL and the community. Both the industry and ATF have established protocols for providing outreach and support to FFLs and their communities.

And lastly is the response. An FFL's ability to respond quickly and efficiently to a crime against its business is critical to not only identifying the perpetrators of the crime and recovery of stolen goods, but to the speedy reestablishment of daily business operations. ATF and NSSF are both committed to providing timely support to FFLs when a criminal or other emergency event occurs. NSSF and the ATF will often provide matching rewards to information leading to the arrest of those responsible for the crime.

It's important to detail this approach to illustrate the way we educate, analyze, assess, plan, strategize and respond in a personalized way unique to each FFL. No FFL is the same, so the work has to be tailored to fit that specific situation. A one size fits all, punitive, unfunded mandate is ineffective.

As an example, if it were to be mandated that all FFLs retain video recordings for say a year the cost to the FFL would be prohibitive. Video storage example – ramifications of “one size fits all” 24 x 7 168 hours week, 8760 hours in year, 1 terabyte holds about 500 hours of HD video, about 1T every 3 days, about 121T a year.

Equipment Cost, servers, switches, software, racks, heating cooling of room with equipment, labor to manage.

Statistically, far fewer firearms are lost or stolen from FFLs than they are from private citizens, law enforcement agencies, and the military. While we appreciate the attention to the issue of thefts of firearms from FFLS, as we, too, take it seriously, Congress would be better off paying the same level of attention to the military and law enforcement.

There are several other recommendations that I believe would be a more productive approach Use OSS as basis for inspection and certification. Include all sources of consolidated firearms in the bill to include common carrier, rail service, private security, law enforcement and Military. Funding for FFLs to acquire and manage security equipment. Funding for increased and continued education across the industry. Require reporting of missing/lost firearms in 48 hours for all. Give FFLs access to NCIC when acquiring used firearm to determine if reported lost/stolen. Publish number of lost/stolen reported, by persons, private security, law enforcement and military as well as firearms recovered at crime scenes from each. Lastly, how many firearms are used in crimes or recovered from crime scenes from all sources.

Again, thank you for the opportunity to discuss the important work we do on behalf of the industry, law enforcement and the American people. I am happy to answer any questions you may have.