



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

SEP 14 2004

Washington, DC 20226

www.atf.gov

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03-0486
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Larry T. Constantino
Pacific Scientific
HTL/Kin-Tech Division
1800 Highland Avenue
Duarte, California 91010

Dear Mr. Constantino:

This is in response to your letter dated July 24, 2004, to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). You requested that we add several devices to your approved exemption letters dated December 12, 2001, and June 20, 2002. You have also requested that your completed cartridge-actuated devices be exempted from the regulations contained in 27 CFR, Part 555.

Your initial request was submitted in August 27, 2003. After reviewing the request, we concluded that your Miami, Florida, office submitted the same request and received an approved exemption letter from ATF. Therefore, in this letter we will address only the devices that were listed on your July 24, 2004, letter/facsimile. You stated that these devices are similar to the prior devices that we approved for exemption, that they only differ in explosive compositions and that they perform the same actions as previous devices.

You stated that the devices are used in cable cutters, aircraft fire suppression systems, and emergency escape slides. The cartridges contains 362 milligrams or less of explosive material. The devices are classified by the Department of Transportation as Cartridge, Power Devices, 1.4. You are requesting the following part numbers to be exempt:

30900000M	30903860	30903892	30903925-1	36400048-1
30903801	30903861	30903894	30903928	36400049-1
30903822	30903870	30903895	30903931	52000828-1
30903824	30903871	30903896	30903946	52000859-1
30903827	30903872	30903898	30903947	52000868-1
30903828	30903874	30903899	30903948	51300325-1, -4
30903836	30903875	30903912	30903973	51300043-1

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30903845	30903876	30903913	2-100420	53000399-1
30903856	30903889	30903915	2-100560	30180155 REV. H
30903857	30903890	30903916	52000735-1, -2	36400048-1
30903859	30903891	30903924-1, -2	36400049-1	52000828-1
52000859-1	52000868-1			

This exemption applies only to the assembled cartridge devices described and numbered above. Any alterations to these devices, or the manufacture of different devices, will render this exemption void and necessitate a separate request for exemption.

Although, we have determined that these devices are not regulated, the explosive materials used in their manufacture are subject to all of the provisions of 27 CFR, Part 555. Any explosive materials removed from this device are also subject to regulation.

We trust the foregoing is responsive to your request. If you have questions please contact the Explosives Industry Programs Branch at (202) 927-2310.

Sincerely yours,



Mark A. Siebert
Deputy Chief, Arson and Explosives
Programs Division

c: Special Agent in Charge, Los Angeles Field Division
Area Supervisor, Los Angeles Field Office
Chief, National Licensing Center