



November 16, 2017

**Honorable Members of the Committee
Joint Committee on Public Safety and Homeland Security
State House
24 Beacon Street
Boston, Massachusetts 02133**

**Re: S. 1317 and S. 1340 (Firearm Suppressors)
Position: Support**

Honorable Members of the Committee:

My name is Knox Williams. I am the President and Executive Director of the American Suppressor Association (ASA), a non-profit organization which advocates on behalf of the firearm suppressor community. I write you today to express our support of S. 1317 and S. 1340, two bills which seek to legalize the possession of suppressors in Massachusetts. Suppressors are currently legal to own in 42 states, 40 of which allow their use while hunting.

Suppressors are one of the most misunderstood tools in existence. The majority of Americans believe that suppressors fully silence the noise of a gunshot. This notion is unequivocally and empirically false. The primary root of this misconception comes from film, where agents like James Bond are able to use a suppressor to shoot without noise. While sometimes entertaining, Hollywood's depiction of suppressors does not have any basis in reality, giving the public at large an understandably false expectation of what suppressors actually do. Interestingly enough, many countries in Europe, including the United Kingdom, the very country that gives us James Bond, encourage their hunters to utilize suppressors in order to reduce noise pollution and help protect hearing.

The terms "silencer" and "suppressor" refer to the same thing – a muffler for a firearm. It is important to note that nothing can actually silence the noise of a gunshot. Physics will simply not allow it, as there are too many variables that suppressors do not affect. In reality, suppressors work in the same manner as mufflers on cars, which function by trapping hot expanding gasses and allowing them to slowly cool, thereby reducing the noise to safer levels.

On average, suppressors reduce the noise of a gunshot by 20 – 35 decibels (dB), roughly the same sound reduction as earplugs or earmuffs. Even the most effective suppressors on the market, on the smallest and quietest calibers, like .22 LR, reduce the peak sound level of a gunshot to around 110 – 120 decibels. To put that in perspective, according to the National Institute for Occupational Safety and Health (NIOSH), that is as loud as a jackhammer (110 dB) or an ambulance siren (120 dB).

From a hearing conservation perspective, according to Dr. William W. Clark, the current Director of the Washington University School of Medicine's Program in Audiology and Communication Sciences, "the most serious threat to hearing comes from recreational hunting or target shooting".¹ This is in large part due to the fact that many people choose not to use traditional hearing protection devices like earplugs and earmuffs. Multiple studies have found that between 70 to 80% of hunters never wear earplugs or earmuffs, and nearly half of all target shooters don't consistently wear traditional hearing protection.^{2,3} Thus, it should come as no surprise that for every five years of hunting, hunters become seven percent more likely to experience high frequency hearing loss.⁴

In a 2011 study, the Centers for Disease Control and Prevention (CDC) stated, "the only potentially effective noise control method to reduce students' or instructors' noise exposure from gunfire is through



the use of noise suppressors that can be attached to the end of the gun barrel. However, some states do not permit civilians to use suppressors on firearms.”⁵ Massachusetts is one such state.

In a similar study from 2014 on noise exposure at shooting ranges, NIOSH recommended, “if feasible and legally permissible, attach noise suppressors to firearms to reduce peak sound pressure levels.”⁶

In March, 2017, the National Hearing Conservation Association’s Task Force on Prevention of Noise-Induced Hearing Loss from Firearm Noise stated that “using firearms equipped with suppressors” is one of “several strategies [that] can be employed to reduce the risk of acquiring Noise-Induced Hearing Loss and associated tinnitus from firearm noise exposure.”⁷

Although legal in 42 states, suppressors have been federally regulated since the passage of the National Firearms Act of 1934. As the law currently stands, in order to buy a suppressor, prospective buyers must send in an application including fingerprints and passport photos to the ATF, pay a \$200 transfer tax, and wait for an indeterminate amount of time for the ATF to process the application. As of November, 2017, wait times range from 6 to 14 months. It is an overly burdensome process that current ATF leadership has recognized as having little to no positive impact on public safety.

Some will claim that suppressors are not used in crime because they are rare, but that is not true. According to the ATF, there were 1,360,023 suppressors in circulation in the United States as of April, 2017. Most criminals are not interested in suppressors because they do not actually silence a gunshot. Suppressors also add length and weight to their host firearm, which make them inherently harder to conceal. Furthermore, criminals know that using a suppressor in the commission of a crime will carry stiff State and Federal penalties that will remain even with the passage of this legislation.

By supporting S. 1317 and/or S. 1340, you are doing your part to give sportsmen and women in Massachusetts the option to use suppressors, ensuring that future generations will no longer have to choose between their passion and their hearing. For those of you who have shooting ranges or hunting lands in your district, suppressors will help make law abiding gun owners better neighbors by reducing noise pollution and complaints.

In 2013, Montana Governor Steve Bullock held the common misconception that suppressors could silence a firearm, which led him to veto suppressor hunting legislation in his state. However, spending time to become educated on the issue, he reversed course and urged the Montana legislature to legalize their use in the field. In a letter to the Speaker of the House from March, 2015, he wrote:

“The public perception of suppressors as the same thing as silencers, where the assassin quietly dispatches his victim, no longer holds true. Suppressors mitigate the sound of a shot, but do not silence it. The use of suppressors for hunting, when hunters cannot wear ear protection because they need to be aware of their surroundings, can help protect against hearing loss. This is especially true for our younger hunters, even those who are not actually hunting but are accompanying their parent in the field.

I understand the concerns regarding the risks of increased poaching and do not take this lightly, but other states have not found this to be the case.”

Gov. Bullock’s change of opinion wasn’t ideological, it was educational. Unlike many firearms issues, pro-suppressor reform has received a tremendous amount of bipartisan support across the country. In the past three years, three Democratic Governors have signed standalone pro-suppressor bills into law - Gov. Steve Bullock (MT) in 2015, Gov. Peter Shumlin (VT) in 2015, and Gov. Maggie Hassan (NH) in 2016.

One of the primary reasons for such widespread bipartisan support is because the use of suppressors by criminals is virtually nonexistent. According to a white paper titled “*Options to Reduce or Modify*



Firearms Regulations”, by Ronald Turk, Associate Deputy Director and Chief Operating Officer of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), “silencers are very rarely used in criminal shootings. Given the lack of criminality associated with silencers, it is reasonable to conclude that they should not be viewed as a threat to public safety”.

The way Massachusetts law is currently drafted, only federally licensed suppressor manufacturers can possess suppressors in the state. This legislation will have a direct impact on in-state manufacturers, including Yankee Hill Machine, headquartered in Florence, Smith and Wesson, headquartered in Springfield, and Sig Sauer, who has over 80 employees who commute to work in New Hampshire from Mass.

For any interested legislators or law enforcement officers, we would be happy to host an educational suppressor demonstration in Massachusetts at any time of your choosing. Thank you for your time and consideration. On behalf of the sportsmen and women in Massachusetts, I respectfully ask for your support of these two bills.

Sincerely,

Knox Williams
President & Executive Director
American Suppressor Association

¹ Clark WW. (1991) Noise exposure from leisure activities: a review. *J Acoust Soc Am* 90(1):175–181.

²Wagner A, Stewart M, Lehman ME. (2006) Risk patterns and shooting habits of recreational firearm users. In: Abstracts of the National Hearing Conservation Association Annual Conference 2006, Tampa, Florida. *NHCA Spectrum* 23(Suppl. 1):28.

³ Stewart M, Foley L, Lehman ME, Gerlach A. (2011) Risks Faced by Recreational Firearm Users. *Audiology Today*, March-April:38–52.

⁴ Chen L, Brueck SE. (2011) Noise and Lead Exposures at an Outdoor Firing Range – California. Health Hazard Evaluation Report HETA 2011-0069-3140:5.

⁵ Brueck SE, Kardous CA, Oza A, Murphy WJ. (2014) Measurement of Exposure to Impulsive Noise at Indoor and Outdoor Firing Ranges during Tactical Training Exercises. Health Hazard Evaluation Report HETA 2013-0124-3208:14.

⁶ Murphy S, Meinke DK, Flamme GA, Murphy WJ, Finan DS, Lankford, JE, Tasko SM. (2017) NHCA Position Statement: Recreational Firearm Noise. NHCA Task Force on Prevention of Noise-Induced Hearing Loss from Firearm Noise: 1.