



Written Testimony to the Massachusetts Joint Committee on the Judiciary
In Support of H. 763 and H. 789
July 18, 2017

Chairpersons Brownsberger and Cronin, Vice-Chairs Chang-Diaz and Cantwell, and members of the Committee:

I am writing on behalf of the American Suppressor Association to express our support of H. 763 and H. 789, 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.

For most people, suppressors are known only as silencers, and the only time they have seen them in use is in film. Although entertaining, Hollywood's depiction of suppressors does not have any basis in reality, giving people an understandably false expectation of what suppressors actually do.

The terms "silencer" and "suppressor" refer to the same thing – a muffler for a firearm. In order to understand suppressors, it is important to note that nothing can actually silence the noise of a gunshot. Physics will simply not allow it. Suppressors work in the exact same way as mufflers on cars, which function by trapping the hot expanding gasses and allowing them to slowly cool, thereby reducing the noise to safer levels.

On average, they 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}

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."⁴ 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."⁵

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 NIHL and associated tinnitus from firearm noise exposure."⁶

By supporting this legislation, 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. In addition to hearing protection, suppressors also mitigate noise complaints from those who live near shooting ranges.



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, once he became properly 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*.