

## **Comments on Proposed Rules (Dated 10/22/2024)**

### **§ 3-05 Rule (a)(7): Medical Conditions and Disabilities**

The inclusion of specific medical conditions such as epilepsy, diabetes, fainting spells, and nervous disorders as factors for disqualification is overly broad and discriminatory. Modern medicine allows many individuals to manage these conditions responsibly, and blanket exclusions fail to account for personal circumstances.

#### **Suggested Revision:**

Replace this rule with language that requires a physician's certification attesting to an applicant's fitness to handle firearms safely. This approach ensures fairness and avoids unnecessary exclusion based on manageable medical conditions.

### **§ 3-11 Purchase of Ammunition**

Requiring a certificate of registration to purchase ammunition adds an unnecessary layer of bureaucracy. Existing procedure which consists of a valid firearm permit with listed caliber + NICS check is a robust & sufficient proof of eligibility to buy ammunition.

#### **Suggested Revision:**

Eliminate the requirement for a certificate of registration and allow permittees to use their firearm permit as proof of eligibility when purchasing ammunition.

### **§ 3-14 Rule (c): Transportation of Rifles/Shotguns**

The rule prohibiting permittees from leaving a rifle or shotgun in a vehicle unless they are physically present or in close proximity is impractical for everyday situations.

#### **Suggested Revision:**

Introduce exceptions for brief absences where the firearm is securely locked, such as when paying for gas, using a restroom, or running a quick errand. For example:  
"The permittee may briefly leave their rifle/shotgun securely locked in their vehicle for reasonable, time-limited activities, provided it is stored in a locked compartment or firearm safe."

### **§ 5-25 Handgun Acquisition Requirements (Rules A and G)**

**Rule A: Restrictions on the number of firearms a licensed individual can purchase within a certain timeframe are unnecessary and punitive. Licensed individuals have already demonstrated their responsibility, and further limiting their ability to purchase firearms offers no clear public safety benefit.**

**Rule G: Limiting the number of handguns a licensed individual can own to two for Premise Residence or Carry licenses is unreasonable. Ownership and carrying are distinct issues and should be treated separately. Transporting multiple firearms securely (e.g., to a shooting range) should not be restricted.**

#### **Suggested Revisions:**

- **Rule A:** Remove restrictions on firearm purchase frequency and quantity for licensed individuals.
- **Rule G:** Eliminate the two-handgun ownership limit and instead require secure transport protocols (e.g., locked cases) for carrying multiple firearms. Allow lawful transport of all owned firearms to ranges or other legal destinations.