



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Explosives Industry Programs Branch

Washington, DC 20226

www.atf.gov

April 28, 2020

903070:RML
20-826669
555.207; 555.208
555.209; 555.210
555.211
5401

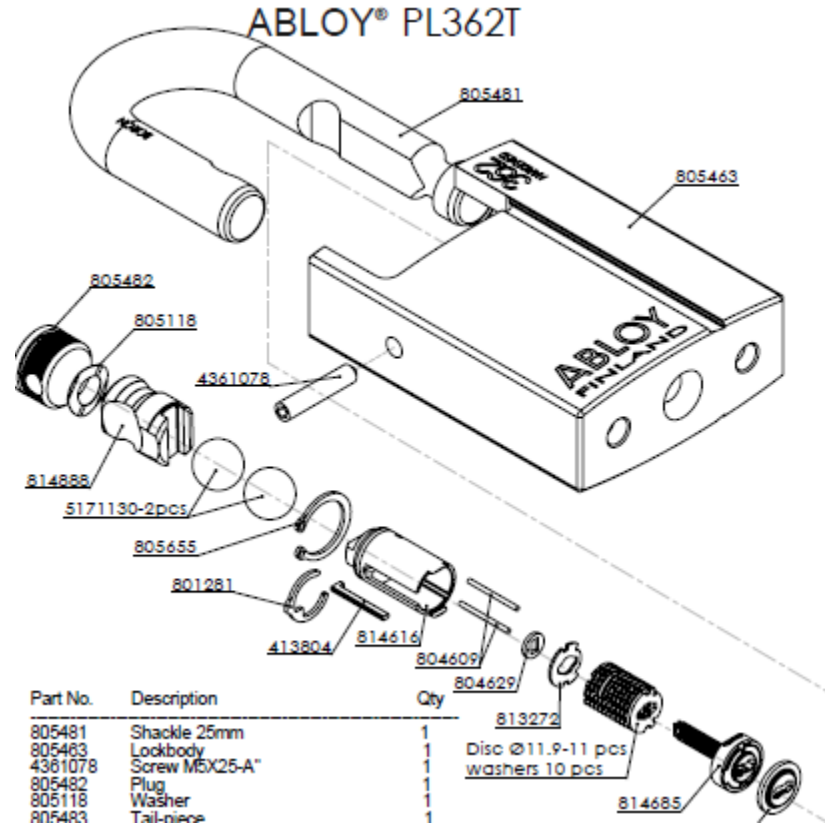
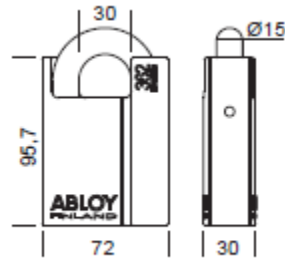
Mr. Shayne Spears
Vertical Market Manager
ASSA ABLOY Global Solutions
6005 Commerce Dr. #330
Irving, TX 75063

Dear Mr. Spears:

This is in response to your request received March 10, 2020 to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Explosives Industry Programs Branch (EIPB). ASSA ABLOY Global Solution (ABLOY) requests a determination regarding its rotating disc padlock Protec 2 model PL362T for explosives licensees and permittees to utilize as locking devices on explosive magazines. ATF has determined that the ABLOY padlock Protec 2 model PL362T locks are substantially equivalent to the regulations at 27 CFR 555, Subpart K.

You provided a lock drawing, a technical manual, a datasheet and a video of the Protec 2 model PL362T padlock with your request. According to your request, the Protec 2 model PL362T padlock has been made since 2001 and is made of case hardened boron steel with 10 mm or .394" shackle diameter that is case hardened and contains 11 rotating discs to allow for locking and unlocking. You state that the rotating discs are more secure than the traditional tumblers or pins used in locks and the discs cannot be bumped/picked. Additionally, you state that the rotating discs prevents wear and tear by not allowing debris to be caught in the discs creating rust thereby creating the need for the locks to have to be replaced.

Mr. Shayne Spears
ASSA ABLOY Global Solutions



As you may know, the regulations in 27 CFR 555.207, 555.208, 555.209, 555.210, and 555.211 permit explosives storage magazines to be secured with two padlocks protected with ¼-inch steel hoods provided the padlocks have at least five tumblers and a casehardened shackle of at least ⅜-inch diameter.

Mr. Shayne Spears
ASSA ABLOY Global Solutions

The aforementioned locking regulations do not specify what type of padlock tumbler must be used to secure explosives storage magazines. Therefore, padlocks constructed with at least five disc tumblers and a casehardened shackle of at least 3/8-inch diameter are substantially equivalent to the regulations at 27 CFR 555, Subpart K.

Based on the aforementioned, ATF has determined that the ABLOY padlock Protec 2 model PL362T locks are substantially equivalent to the regulations at 27 CFR 555, Subpart K. This determination does not convey any rights or privileges contrary to any other Federal, State, and/or local laws.

We trust the foregoing has been responsive to your request. If you should have further questions, please contact the Explosives Industry Programs Branch at eipb@atf.gov or (202) 648-7120.

Sincerely yours,



Annette Butler
Chief, Explosives Industry Programs Branch

cc: Deputy Assistant Director, Industry Operations
All Directors of Industry Operations
Shayne.spears@assaabloy.com