

Helpful Hints on Preparing a Complete Registration Package & Submitting Material Changes to Registration

**Office of Defense Trade Controls Compliance
Directorate of Defense Trade Controls
Bureau of Political-Military Affairs
United States Department of State**

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HELPFUL HINTS

A. SUBMITTING A COMPLETE REGISTRATION PACKAGE

The Office of Defense Trade Controls Compliance (DTCC) is posting this list of helpful hints to improve the quality of registration submissions.

Before submitting a registration package double check whether your U.S. parent, if applicable, is registered. If so, your company should be listed on the parent company's registration and your submission would be unnecessary.

What is considered a complete registration package for a new or renewal submission?

❖ **A complete registration package includes:**

- Form DS-2032 (Statement of Registration)
- Transmittal Letter
- Documentation of incorporation or other authorization to do business in the United States (or equivalent for foreign brokers outside the United States)
- Fees prescribed in ITAR §122.3(a)
- Form and Letter signed in ink by a senior officer who also qualifies as an empowered official per ITAR §120.25. Foreign broker senior officers must meet the same qualifications except not required to be U.S. persons.

❖ **A renewal package requires ALL of the same documentation as an initial submission. Pursuant to ITAR §122.3(b), renewal packages must be received by DTCC no less than 30 days BEFORE the expiration date. As a precaution, we recommend that packages be submitted 60 days prior to expiration date to reduce the chance that your registration expires. The consequences of expired registration include: loss of your eligibility to export and use of ITAR exemptions.**

What are some helpful hints to ensure that the submission is complete?

Answering the following questions should help you submit a complete package. (Note: this is a list of information commonly left out and does not cover every block of the form DS-2032.)

_____ Have you responded to every block? For example, if block #2 and/or blocks # 9 – 12 do not apply to your company, enter “N/A.”

_____ (Block # 1) Have you included your company name and address (must include physical street address, but can also include a P.O. Box for mailing purposes) and **included telephone number and fax number where DTCC may contact you?**

_____ (Block # 2) If submitting a registration request for the first time, enter “N/A” in this block.

_____ (Block #2) If submitting a renewal, enter your existing registration number.

_____ (Block # 3) Circle the correct number of years (1 or 2) and check to make sure the listed dollar amount matches correctly (1 year \$1,750 or 2 years \$3,500).

_____ Write the check or money order to the Department of State **for the correct amount in U.S. currency** as specified in Block #3 (1 year \$1,750 or 2 years \$3,500) and which is also payable through a U.S. financial institution.

_____ (Block # 5) You may register as a manufacturer, exporter of hardware/technical data and exporter of defense services under one complete registration package. To register as broker as defined in ITAR Part 129 requires a separate, complete registration package (including fee).

_____ (Block # 6) Have you attached your official government authorization to do business in the U.S. (or equivalent for foreign brokers) and reflected the place and date of incorporation in this block. Acceptable documents include:

- State Incorporation Certificate
- State Certificate of Good Standing
- State, County, or City Business License
- State Articles of Incorporation, sole proprietorship, partnerships, limited liability partnership/company, and corporations.

Note to Manufacturers/Exporters of **Category I** defense articles: **Please include a copy of your current Federal Firearms License (FFL)** issued by the Bureau of Alcohol, Tobacco, Firearms and Explosives (BATFE) of the Department of Justice.

_____ (Block #7) Information on Directors, Officers, Partners and Owners must include the:

- **Full last and first names and middle initials (do not abbreviate first names and if no middle initial, then enter “N/A”).**
- **Position** (e.g., President, Chief Executive Officer, Chief Financial Officer, Owner as reflected in the articles of incorporation, partnership or joint venture agreement).
- **Foreign** Directors and Owners citizenship must be specifically identified. If living in the United States, provide copy of permanent residency documentation and visa information, as applicable, as an additional attachment.
- Place of birth should include **city, state, and country.**
- **Social Security #** (If not provided **may take longer** to process).
- **Home Address** (Must be a physical street address. You may add a mailing address, but it cannot be a substitute for the physical address).
- **Citizenship** (if U.S. citizen please enter “U.S.”).

_____ (Block # 8) Review the U.S. Munitions List (USML) categories that are applicable to your business (see ITAR Category 121 at http://www.pmdtc.state.gov/itar_index.htm). **A USML category must be entered with a description of the articles and/or services.** If working as a subcontractor and you don't know the purchasing government agency, please enter “N/A.”

_____ (Block # 9 -10) List all wholly and partially owned U.S. or foreign subsidiaries (to include joint ventures) that manufacture, export, and/or broker USML articles, technical data or services.

_____ (Block # 11) Before submitting the registration package double check whether your U.S. parent, if applicable, is registered. If so, your company should be listed on the parent company's registration and your submission would be unnecessary. If not, the registration should be submitted under the parent company as the ultimate operational, legal company in the U.S. If there is no parent company, enter “N/A.”

____ (Block # 12) If applicable, need full name and address of ultimate foreign person (includes company) along with telephone and fax number. If a company is owned and/or controlled by foreign persons, then the associated transmittal letter must also reflect this fact. The submission must include details on the degree/percentage of ownership and control by the foreign persons and reflect the ultimate owner (e.g., U.S. company UVW is 100% owned by foreign company XYZ which is 50% owned by Jon Smith a UK citizen and 50% owned by Jane Smith a UK citizen). Control is presumed to exist where foreign persons own 25% or more of the outstanding voting securities if no U.S. persons control an equal or larger percentage. It also means that one or more foreign persons have the authority to establish or direct the general policies or day-to-day operations of the firm. (See ITAR §122.2(c)).

____ For Block # 14, ensure the Registration Form **DS-2032** and **transmittal letter are signed in ink by a senior officer listed in Block #7 of the DS-2032, who qualifies as an empowered official as defined in ITAR §120.25.** Foreign broker senior officers, although not U.S. persons, must meet the same qualifications of an empowered official.

B. SUBMITTING MATERIAL CHANGES (Officers, Company Name & Address). Make sure they are submitted:

____ Within required time-frames (60 days for foreign ownership and control and 5 days for other material changes).

____ On Company Letterhead.

____ Listing your current registration number.

____ With a revised transmittal letter and signed by a senior officer of Company who is listed in Block #7 of the DS-2032 and who qualifies as an empowered official per ITAR §120.25. Foreign broker senior officers must meet the same qualifications except not required to be U.S. persons.

____ With the current date.

____ With all legal documentation as attachments supporting the material change. For example:

Ineligibility Changes (5-days):

Documentation such as indictment, letter of suspension or debarment, conviction.

Officer/Director Changes (5-days):

Documentation to include all detail on the individual being added that would be included in Block #7 of the Form DS-2032. Revise transmittal letter to reflect eligibility of persons added and include as attachment.

Company Name & Address Changes (5-days):

Changes need to be submitted on your new company letterhead. Include documentation supporting the change, such as a business license or articles of incorporation, plus a new federal firearms license (as applicable).

Domestic Acquisitions/Divestitures (5-days):

Specify type of transaction and whether the registrant is the buyer or seller. Identify all parties to be involved, licenses to be moved from one registrant code to another, any senior officer changes, for example.

Foreign Acquisitions/Divestitures (60-days):

Specify type of transactions and whether the registrant is the buyer or seller. Identify all parties to be involved, any changes in registrant structure or senior officers. Provide specific details on changes to current registrant ownership and control by specific individuals or companies, their authorities or abilities to establish or direct the general policies or day-to-day operations of the registrant. We recommend you include current compliance structure from senior officer to empowered officials, where located, who they report to, and current compliance program. Other information may be requested to review the transaction per ITAR §122.4(b).

Mailing Your Registration Form

Postal Mailing Address

U.S. Department of State
Directorate of Defense Trade Controls
Compliance & Registration Division
2401 E Street NW, SA-1, Room H1200
Washington, DC 20522-0112

Express Mailing Address and Courier Delivery Service

U.S. Department of State
Directorate of Defense Trade Controls
Compliance & Registration Division
2401 E Street NW, SA-1, Room H1200
Washington, DC 20037

(Until the form is updated, this mailing information supersedes that provided on the DS-2032 instructions page.)

General Questions on Registration?

For general questions on registration including preparation of registration forms and status, please contact the Response Team at (202) 663-1282 or by e-mail at DDTCResponseTeam@state.gov.