

Directorate of Defense Trade Controls

Registration

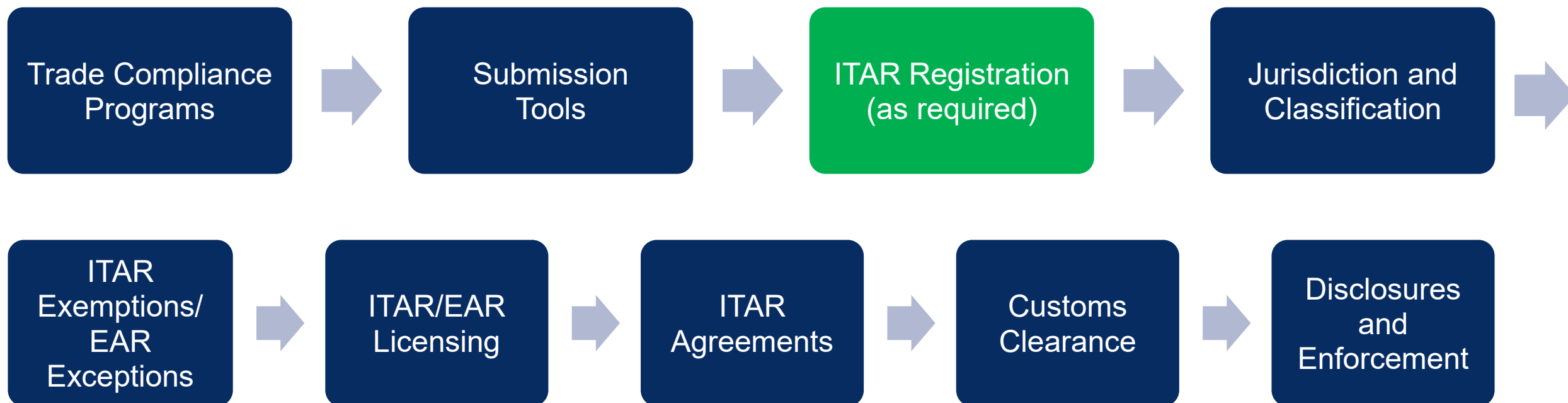


★ ★ ★ U.S. DEPARTMENT *of* STATE ★ ★ ★



Conference Agenda

We are here in the transaction process!



Introduction

About DDTC:

Mission: Ensuring commercial exports of defense articles and defense services advance U.S. national security and foreign policy objectives.

Key Functions:

- Establishing and maintaining defense export regulations (ITAR)
- Registering entities and individuals
- Adjudicating export licenses
- Responding to inquiries
- Promoting and enforcing compliance

Organizational Structure:

Policy Office (DTCP)

Licensing Office (DTCL)

Compliance Office (DTCC)

Management Office (DTCM)

About the Speaker: Dan Cook is Division Chief of the Registration Compliance & Analysis (RCA) Division and Division Chief of the Transaction Analysis and Mitigation Division





Agenda

1. Registration Overview
2. New Registration
3. Renewing Registrations (+ Lapsed)
4. Registration Amendments
5. Q&A



Registration Overview

Why Register with DDTC?

PURPOSE:

The Arms Export Control Act requires that all manufacturers, exporters, temporary importers, and brokers of defense articles (including technical data) as defined on the United States Munitions List (ITAR part 121) and furnishers of defense services register with the Directorate of Defense Trade Controls (DDTC).



Why Register with DDTC?

IN PRACTICE:

- It is primarily a means to provide the U.S. Government with necessary information on who is involved in certain ITAR controlled activities; it does not confer any export or temporary import rights or privileges.
- Registration is generally a precondition for the issuance of any license or other approval and use of certain exemptions.

Registration Types

Manufacturers/Exporter (M)

Assigned to a manufacturer and/or exporter

Broker (K)

Assigned to a Broker

*Cannot apply for an exporter license

Important Consideration

The Registration code is proprietary to the registrant and should be handled as such. Company registration codes should not be posted online or given out to the general public.



Validity Period

The validity period for new and renewal registrations is twelve (12) months. Registrations are **NOT** automatically renewed

Review Times

The average review time for a registration request is 30 days.

You may begin preparing your registration documents in DTCC's system up to 90 days in advance of your expiration (Renewals)

You may submit your renewal up to a maximum of 60 days in advance of the renewal expiration

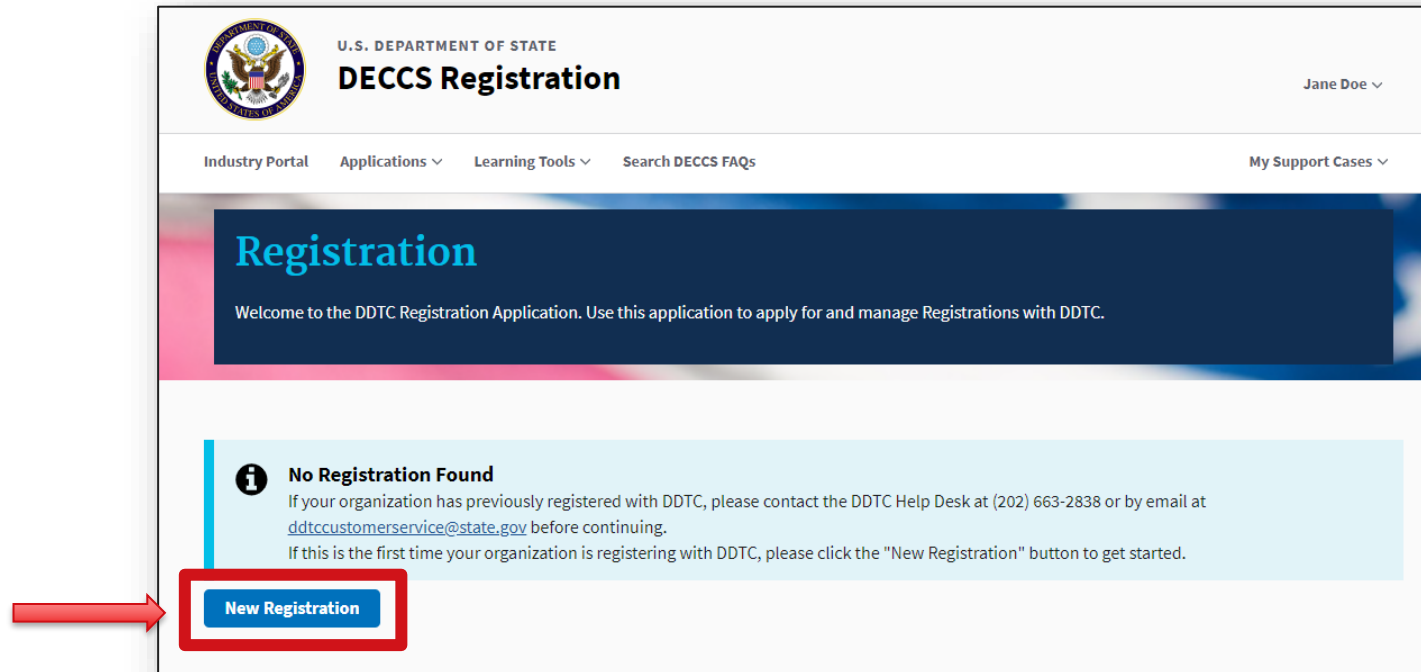


New Registration

New Registration

This screen shot is from the Defense Export Control and Compliance System (DECCS) new Registration page for companies and individuals who are **not yet** registered with DDTC.

Let's review some key information that must be provided on the DS-2032 Form.



Defense Export Control Compliance System (DECCS) Registration Review

Key Required DS-2032 Form Information:

- Legal Structure, Legal Name, and Address
- Senior Officers, Directors, and Owners
- US Munitions List Categories
- Subsidiaries, Affiliates, and Parents
- Indicate if a Compliance Program Established
- Indictments or Convictions per 120.6
- Indicate if the Registrant is Eligible to Contract with USG
- Authorization to do Business
- Signed by Senior Officer/Official



Common DS-2032 Form Errors

Attempting to register
using DBA or fictitious
name

Not including all
senior officers,
partners, owners, and
members of the board
of directors

Selecting Cat XXI
without having a CJ
Determination #

Not including required
information in
brokering report

Not including required
proof that applicant is
authorized to do
business documents

Trying to make
payment outside of
DECCS Registration



Making a Registration Payment

After DDTC issues the DS-2032, the registration application's status will change to "Pending Payment." To make this payment, follow the instructions presented on the dashboard, or reference one of DDTC's knowledge articles on completing registration payments.

Important notes about completing the registration payment:

- DECCS sends an automated notification email to the registrant that the registration is awaiting payment.
- Registrations must be paid within 21 days of being issued, otherwise the Registration will be Returned Without Action (RWA'd).



The screenshot displays a registration application dashboard. On the left, under the heading "In Progress", the following details are listed: "Application Id: 1766", "Form: DS-2032", "Action: New", "Registration Type: Manufacturer/Exporter, Broker (US Person)", and "Status: Pending Payment". The "Status: Pending Payment" text is enclosed in a red rectangular box. On the right side of the dashboard, there are two buttons: "Make Payment" (which features a credit card icon and is also enclosed in a red rectangular box) and "View Details" (which features a magnifying glass icon).



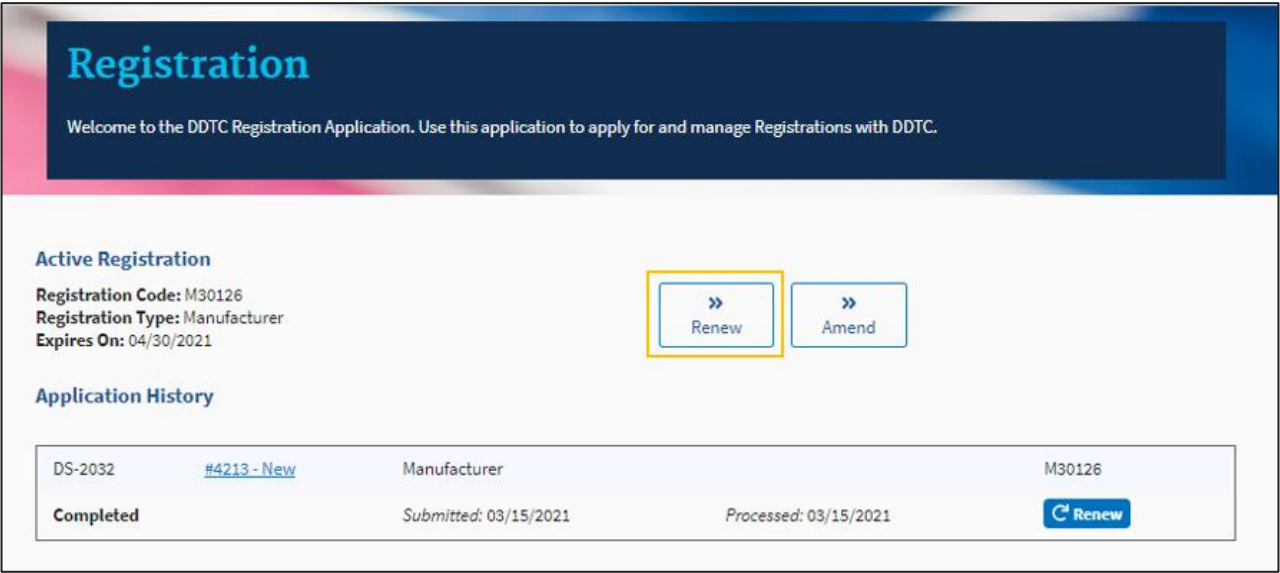
DECCS Registration Renewal

Registration Renewal

Before the registration is set to expire, companies and individuals have the option to begin the renewal process.

Registration renewals can be prepared in DECCS up to 90 days in advance of expiration and submitted up to 60 days in advance.

Registrations do not automatically renew. Users must login to DECCS and manually renew. If not, the registration will expire. Users **should not** cancel registrations if they **do not plan to renew**, just let it expire naturally!



Renewal Fee Details

Tier 2 or 3 Registrants can see details regarding their current renewal fee

Renewal Fee Details

Expiration Date:	07/22/2023
License Period Start Date:	04/23/2022
License Period End Date:	04/23/2023
# of Licenses:	31
Total License Value (TLV):	\$626,864,302,624.00
3% of TLV Reduced Fee:	\$18,805,929,078.72
Renewal Fee Calculated by DDTC:	\$8,000.00

[How Renewal Fees are Calculated](#)

Download Licenses

Close

Renewal Best Practices

Timing and Alerts

Always be sure to begin renewing registration applications as early as possible. We recommend users to also set alerts on their calendars/phones to remind them of the 90-day preparation and 60-day submission availabilities.

Multiple Parties Involved

Another great practice is ensuring that more than one person is involved in the renewal process. Like our corporate administrator recommendation (designating more than one), having multiple individuals involved in the process covers all bases in case someone retires, is out of the office, on vacation, etc.

State.gov Email

We recommend corporate administrators, POCs, and DECCS users take the time to whitelist state.gov within their email settings to avoid missing important updates



Lapsed Registrations

If a company or individual has not renewed their registration by the time it expires, the DS-2032 is then considered to be a “lapsed registration.”

The registration is expired, not deleted. If the entity or individual conducts ITAR related business during the lapsed period, they will accrue lapsed fees.

While registrations are lapsed:

- Active licenses are paused
- Brokers must submit “broker reports” when renewing

While renewing the DS-2032, if users indicate that they have conducted ITAR business during the lapse, they will be prompted to:

- Fill out date range for which the lapse relates
- Indicate if a Voluntary Disclosure has been filed with DDTC

1 ✓	2	3	4
Application ID: 6145			
Registration Information			
* Registration Action Registration Renewal			
* Registration type ☒ Manufacturer ☐ Exporter ☐ Broker ☐ FMS Freight Forwarder (Exporter) ☐ One Time Exemption ☐ U.S. Government ☐ Foreign Government			
* Did you conduct any ITAR business during the lapse? ☐ Yes ☐ No			
Save Back Next			





FY 2025 Registration Stats





DECCS Registration Amendments



Registration Amendments

Registration

Welcome to the DDTC Registration Application. Use this application to apply for and manage Registrations with DDTC.

Active Registration

Registration Code: M30105
Registration Type: Manufacturer
Expires On: 01/31/2022

»
Amend

Application History

DS-2032	#3603 - New	Manufacturer	M30105
Completed		Submitted: 01/25/2021	Processed: 01/25/2021



Material Change Amendment

There are seven different types of **material change amendments**.

A registrant must, within five days of the event, provide to the Directorate of Defense Trade Controls a written notification.

The notification must be signed by a senior officer.

*** Does the amendment involve a material change to the registration?**

☒ Yes

☐ No

*** Material Change Type**

i Only select Merger, Acquisition, or Divestiture (MAD) when amending a registration as a direct result of a MAD change. Selecting a MAD Change Type may result in delays processing the registration or the registration being returned without action if the registration is deemed to be only a material change.

Material Change Types

☐ Name

☐ Address

☐ Legal Organizational Structure

☐ Eligibility

☐ Criminal Charge

☐ Directors, Senior Officers, Partners, and/or Owners

☐ Establishment/Addition of Subsidiary/Controlled Affiliate

MAD Change Types

☐ Merger

☐ Acquisition

☐ Divestiture

MAD Change Amendment

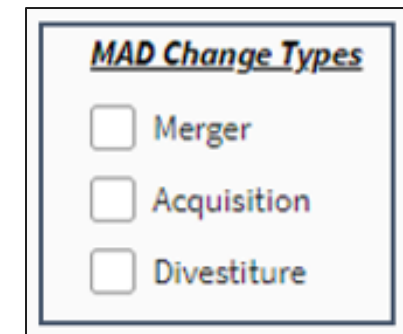
As indicated in the image below, there are three different types of **MAD change types**. These amendments all refer to specific scenarios and different fields within the DS-2032.

122.4(a) "A registrant must, within five days of the event, provide to the Directorate of Defense Trade Controls a written notification, signed by a senior officer" ... "(v) of the merger, acquisition, or divestment of a U.S. or foreign subsidiary or other affiliate who is engaged in manufacturing defense articles, exporting defense articles or defense services;

- Submit electronically via DECCS
- Attach 5-day notification letter

122.4(b) "60 days in advance of any intended sale or transfer to a foreign person of ownership or control of the registrant or any entity thereof"

- Submit to PM-DTCC-MAD@state.gov
- Compliance Program in searchable format



MAD Change Types

☐ Merger

☐ Acquisition

☐ Divestiture



Administrative Amendment

Administrative amendments are used when the change is not material.

It is important to keep contact and reference information up to date.

- By selecting “No” to the question listed below, found within the DS-2032, the submission becomes administrative.

*** Does the amendment involve a material change to the registration?** ⓘ

☐ Yes

☒ No



Amendment Best Practices

Choose the Correct Amendment

For all amendments, it is vital to note that users should only select the change type which applies to the amendment. For instance, while two material change types allow users to alter their registration type, selecting one versus the other can result in an RWA (be sure to review DDTC's FAQs and User Guides for more information).

Amendment Timeline

DDTC recommends not submitting an amendment 60 days before your registration expiration date. Within the 60-day period, DDTC recommends you include the amendment content, such as a company name change or MAD change, with your renewal submission.



General Information

- **Response Team Phone:**
 - 202-663-1282
- **Response Team Email:**
 - ddtccustomerservice@state.gov
- **DDTC Website:**
 - www.pmddtc.state.gov

