



United States Department of State
Bureau of Political-Military Affairs
Directorate of Defense Trade Controls
Washington, D.C. 20522-0112

CHERYL MAINES
President
ALLEN TOOL PHOENIX INC.
6821 ELLICOTT DRIVE
East Syracuse, NY 13057

2023-10-24

REGISTRANT CODE: M12558
EXPIRATION DATE: 2024-11-30

Reference: DDTC Manufacturer Registration Statement and Fee Submission

Dear CHERYL MAINES:

The Office of Defense Trade Controls Compliance (DTCC) received your registration statement and fee to register as a manufacturer. Your registration code is M12558, which expires on 2024-11-30.

Any person who engages in the United States in the business of manufacturing or exporting or temporarily importing defense articles or furnishing defense services is required to register and keep that registration current with this office pursuant to the Arms Export Control Act (AECA) and the International Traffic in Arms Regulations (ITAR). A registration is current if the registration is unexpired and has accurate and up-to-date information.

Registration is a precondition to submitting an application for an export license or other approval from the Directorate of Defense Trade Controls (DDTC) or to use ITAR exemptions but does not confer any export rights or privileges. In addition, if you also plan to engage in brokering activities pursuant to ITAR Part 129, you must register as a broker with DDTC.

As the senior officer empowered to sign the registration statement, you should ensure that your organization maintains records regarding: 1) The senior officer listed on the registration who will oversee the compliance program and be responsible for designating the direct employees who will serve as “empowered officials” for their organization; and 2) The qualified, direct employees who will serve as “empowered officials,” listed by name, position, business unit, phone and fax numbers and email addresses. Please note that third parties (i.e., individuals who are not direct employees, such as consultants, subcontractors, or outside counsel, for example) cannot serve as “empowered officials.”

Also, ITAR Section 122.5 requires you to maintain records concerning your registration and the manufacture, acquisition, and disposition of defense articles; the provision of defense services; and information on political contributions, fees, or commissions furnished or obtained, as required by ITAR Part 130. Records maintained shall be available at all times for inspection and copying by DTCC or Customs officials. To ensure such records are maintained in accordance with ITAR Section 122.5, the organization should provide appropriate training on AECA and ITAR requirements to all employees who will be performing recordkeeping functions and ensure they comply with the ITAR. Ramifications for the failure to comply may include shipment delay and/or shipment seizure by Customs and Border Protection, loss of export privileges, and/or criminal or civil penalties.

Further, if your organization has foreign-person employees, including officers and senior managers,