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Motivating Amateur Radio Clubs to Open New Initiatives (MARCONI)

Program 12: AMATEUR RADIO CLUBS: LEGAL and FINANCIALS ISSUES

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Operational Guidelines

DISCLAIMER: This paper is for the purpose of presenting general information and is not intended to serve as legal advice. Laws vary from state to state, and competent legal counsel should be consulted for guidance related to specific issues.

Statement of Program Purpose: Some thoughts for Amateur Radio Clubs on their legal structure and tax-exempt recognition from the IRS.

Introduction: Amateur Radio Clubs - critical "voluntary associations"

The importance of clubs to the continued health of Amateur Radio Service cannot be overstated. Everyone is aware that the mean age of licensed amateur radio operators is increasing. Wikipedia currently says that the average age of licensed amateur radio operators in most countries is 68 years old. If you are an active radio amateur or attend any hamfests or conventions, it is painfully obvious that we need to get younger people to become interested in the hobby. Amateur radio clubs that that are active and welcome to young and old are a critical part in efforts to improve this demographic. Our clubs are the "front line" in efforts to recruit, educate, test, and mentor new amateur radio operators.

The typical amateur radio club coalesces around a few radio operators who are leaders. They recognize the value of common enterprise. You may be one of these special people – a leader, because you are reading this paper!

This short work is a practical guide to the legal formation and maintenance of the typical nonprofit organization that makes up the majority of amateur radio clubs. Later, this paper will also address the legal issues presented by clubs that are barely hanging on. Resuscitation is possible. This paper will explore options for these organizations and explain that there are pathways to legal reinstatement from your secretary of the state and to regain nonprofit status if it has been lost. Another option is to merge with another, stronger club.

Starting out.

A few amateur radio clubs, at their formation may start out as corporations. Other clubs start out as informal associations. They later may decide to file the paperwork to become corporations. These corporations and informal associations also typically go through the application process with the Internal Revenue Service (IRS) to be recognized as nonprofit organizations.

The first decision is to decide the form of entity for the club. The most common form of nonprofit organization recognized as such by the IRS is the nonprofit corporation. Incorporation is not that complicated. Before we begin our discussion of how to form a corporation, however, the unincorporated nonprofit association merits some attention.

Unincorporated clubs = voluntary associations.

A group of radio amateurs may conduct joint activities and operate as a club, but they are not incorporated. The club members may not want to address organizational issues formally, and they may also feel that that do not want to get bogged down in legal issues. Unincorporated associations do not have to file any documents with the state's secretary of the state's office or the state's tax department. And some states have adopted a model law that provides some legal structure and protection for unincorporated, nonprofit organizations. In these states their laws create default governance provisions for the organization and some limited protection from personal liability for the club's members and managers. [1]

As the number and scope of activities of the unincorporated club increases, however, steps to incorporate as a nonprofit corporation should be considered. When a club grows in terms of membership and size of its treasury increases, being unincorporated leads to uncertainty. The rights, duties and liabilities of the individuals involved with unincorporated, less formal association clubs are less known and predictable. The laws governing corporations, by contract, are very settled and predictable.

Still, the IRS and most states will recognize an unincorporated nonprofit association as a tax-exempt entity if the membership still wants to stay this way. However, the nonprofit association must be sufficiently organized under a set of written governing documents that satisfy the IRS. These typically are the club's constitution and bylaws. But for just a bit more effort it makes sense to incorporate and get more predictable legal protection for the club leaders and its members.

Establishing the Entity's Legal Existence as a nonprofit corporation.

The nonprofit corporation without a doubt is the most appropriate legal entity for a nonprofit amateur radio club. It will be the main focus of this paper. It is the preferred entity because a properly set up and maintained corporate structure protects the club's officers, directors, and members from personal liability for club debts and liabilities. This is similar to the protections accorded to for-profit corporations' officers, directors and shareholders. Some states go even a step further for the protection of nonprofit corporations' officers and directors. For example, Connecticut has a "Good Samaritan" law that specifically provides immunity from lawsuits for officers, directors, and trustees of nonprofit organizations recognized under Section 501(c)(3) of the Internal Revenue Code. This special immunity is provided, however, only if they serve the nonprofit organization without compensation, they are acting within the scope of their duties, and their actions are not reckless, willful or wanton.[1] Other states' laws vary.

Virtually all nonprofit corporations are creations of states' laws. There are very limited exceptions where organizations can be federally chartered, but these are limited to congressionally created entities for the purpose of carrying out specific federal government purposes or goals.

The limited liability company (LLC) is another type of legal entity that shelters its members from legal liability. However there are problems with LLCs from a tax exemption standpoint. The LLC structure provides for one or more members (either individuals or other entities) to have an "ownership interest" in the LLC. This runs counter to the nonprofit organization because no director or member may own the organization or its assets. So far, the IRS has recognized as tax exempt only LLCs whose members are themselves nonprofit corporations.

The incorporation papers – filed with your state secretary of the state.

The creation of the nonprofit corporation starts with the filing of organizational documents. Organizational documents can be divided into two categories: (1) The articles of incorporation, filed with the state's secretary of the state's office, and (2) bylaws, which typically are not filed. Think of the articles as the highest level of the organization's legal structure. Just like the U.S. Constitution, a corporation's articles of incorporation (sometimes also referred to as articles of organization) are the most important document that governs the organization. They also should be the hardest to change. Bylaws, on the other hand, provide more detail to the legal structure and are designed to fill in the smaller details of governance. They also are typically easier to amend or change. Bylaws, however, must carry out the basis and purpose set forth in the articles and may not conflict with them.

The IRS will want certain provisions stated in your corporation's articles. These provisions need to be drafted and contained within the nonprofit corporation's articles and carried out by bylaws prior to their being filed with the secretary of the state.

Amateur radio clubs - nonprofit public benefit corporation.

The recommended type of nonprofit corporation for amateur radio clubs is the public benefit corporation. This corporation type will qualify for tax exempt status under both Sections 501(c)3 and 501(c)(4) of the IRS Code. Though amateur radio clubs can qualify under either section, there are advantages to qualifying under Section 501(c)(3). Public benefit corporations are also referred to as "charitable corporations." A public benefit corporation should provide a service or product to the public that generally is not offered by a for-profit entity. Careful consideration should be given to stating the services

[1] Sec. 52-557m of the Connecticut General Statutes

that will be provided by your amateur radio club that will benefit the public. Consider the guidance that the FCC rules governing the amateur radio service provide. Here is the stated basis and purpose of the amateur radio service in Section 97.1 of the FCC Rules:

(a) Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications.

(b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.

(c) Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communication and technical phases of the art.

(d) Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts.

(e) Continuation and extension of the amateur's unique ability to enhance international goodwill.

Juxtapose the stated basis and purpose of the Amateur Radio Service with the guidance provided in IRS Publication 557, which is entitled “Tax Exempt Status for Your Organization”. Under the 501(c)(3) section it lists seven organizational purposes for which exemption under 501(c)(3) exemption can be granted. Those categories, in the order listed by the IRS are as follows:

Religious
Charitable
Scientific
Testing for public safety
Literary
Educational
Fostering national or international sports competition
The prevention of cruelty to children or animals

The common denominator between the FCC’s basis and purpose of the amateur radio service and the categories of acceptable “purposes” provided by the IRS should jump out. They are charitable, scientific, and educational purposes.

Charitable purposes can be when a club gives scholarships to students to further their science, technical, education and math (STEM) learning activities. Scientific purposes can be the sponsorship of technical experimentation, such as designing and building equipment and/or developing expertise in newer and enhanced methods of electronic communications and ionospheric propagation. Educational purposes can be very broad.

It can encompass teaching classes for licensing, advancement, and how to better achieve the goals of the Federal government established in Section 97.1 of the FCC Rules for the public good. Public service, of course, is a large part of most clubs' activities. But exclusive reliance on public service may cause the IRS to categorize your club as primarily a service organization under 501(c)(4) of the IRS Code. Organizations like Rotary clubs, Lions clubs, and other service organizations are examples of 501(c)(4) civic and service organizations. While there is nothing wrong with 501(c)(4) organizations, they are at a tax disadvantage. While income from their related activities are exempt, individuals who donate to Section 501(c)(4) them cannot take a charitable deduction on their personal income tax returns. Donations made to 501(c)(3) organizations are tax deductible. Getting a 501(c)3 designation is the goal.

Provisions required to be in your club's governing documents.

Each state has the requirements needed to create and register a nonprofit corporation stated in its nonprofit corporation statutes and instructions. It is important to review any instructions or references to these statutes when preparing the club's articles and bylaws. Most states require the following:

A unique name. Each nonprofit corporation must have a name that is unique. What is meant is that the name cannot be the same name or similar to a name already being used. Small variations of popular names already in use, especially in for-profit business commerce, should be avoided. Many states, though not all, require the name to be followed by the word "incorporated", "limited" "corporation", or abbreviations of these or other words (e.g., "inc.", corp.", "ltd").

Statement of Purpose. If the nonprofit corporation is to have tax exempt status under Section 501(c)(3) of the IRS code, the articles of incorporation must state that the purposes of the corporation are limited to one or more exempt purposes permitted under Section 501(c)(3). Specific language the IRS finds acceptable is provided later in this paper.

Dedication of assets. If the nonprofit corporation is to have tax exempt status under Section 501(c)(3) of the IRS code, the articles of incorporation must state that the assets of the corporation are prohibited from being used to benefit an individual and instead must be used solely for the charitable purposes of the corporation. It also is necessary to include a provision that upon dissolution, the corporation's assets may be disposed of and used only for a charitable purpose. Specific language the IRS finds acceptable is provided later in this paper.

Registered agent. Every corporation must have a registered agent on file with the secretary of the state. This is the individual who will accept service of process in the event the corporation is sued. The registered agent also will be the official contact with the secretary of the state for official notices sent to the corporation. For most nonprofit corporations the registered agent will be a volunteer of the corporation. It is important to ensure that the registered agent maintains a current address with the secretary of the state. If a registered agent resigns, a replacement must be named and his or her current address be provided. A nonprofit corporation can be administratively dissolved for failure to file its annual or biennial report, or for failure to respond to official notices that typically are sent to the registered agent. If the volunteer registered agent is no longer involved with the corporation, or the agent's address is not kept current, the corporation will not be informed of reporting requirements. A secretary of the state will administratively dissolve a corporation for its failure to respond to official notices and file required reports.

Incorporators. In some states it is necessary to include names and addresses of one or more incorporators of the nonprofit corporation. The role of an incorporator is to be an individual responsible for signing and filing the articles of incorporation and subsequently convening an organizational meeting or otherwise getting the first board of directors elected or appointed. Where it is not required, the initial board of directors can be identified in the articles of incorporation.

Statement regarding membership. Many states require the articles of incorporation to say whether the corporation has any members, and whether these members have any voting rights. Generally speaking, the board of directors has the ultimate authority and responsibility to see that the nonprofit corporation is properly managed, but it is common for amateur radio clubs to reserve some rights to the club membership. For example, the articles of incorporation may provide for the terms of the directors to be limited and require a vote of the membership for the periodic election of directors. The basic information stating that the nonprofit corporation will have members and that certain decisions are reserved for the members is usually contained in the articles. The bylaws generally fill in the details, such as the duration of the directors' terms of office, how elections are to be conducted, and who qualifies as a member entitled to vote.

Limitation of Directors' Liability and Indemnification. Though it is generally not required, many states allow a provision in the articles of incorporation that limits the liability of the director to the corporation or its members to decisions made in good faith. Another provision often seen in articles of incorporation is an indemnification clause. This means that the corporation will cover the costs of defense of a director who may be sued while acting on behalf of the corporation.

Provisions required by the IRS for recognition of tax-exempt status under Section 501)c)(3)

IRS Publication 557 that provides examples of statements required to be in the articles of incorporation. These pertain to its exempt purposes and limits on the powers of the organization to use its assets and, upon disposition, dispose of them. These are as follows:

- Said corporation is organized exclusively for charitable, religious, educational, and scientific purposes, including, for such purposes, the making of distributions to organizations that qualify as exempt organizations under section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future federal tax code.

- No part of the net earnings of the corporation shall inure to the benefit of, or be distributable to its members, trustees, officers, or other private persons, except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in Article Third hereof.

- No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in (including the publishing or distribution of statements) any political campaign on behalf of or in opposition to any candidate for public office.

- Notwithstanding any other provision of these articles, the corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from federal income tax under section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future federal tax code, or (b) by a corporation, contributions to which are deductible under section 170(c)(2) of the Internal Revenue Code, or the corresponding section of any future federal tax code.

- Upon the dissolution of the corporation, assets shall be distributed for one or more exempt purposes within the meaning of section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future federal tax code, or shall be distributed to the federal government, or to a state or local government for a public purpose. Any such assets not so disposed of shall be disposed of by a Court of Competent Jurisdiction of the county or court district in which the principal office of the corporation is then located, exclusively for such purposes or to such organization or organizations, as said Court shall determine, are organized and operated exclusively for such purposes.

Amendments to the Articles of Incorporation. Finally, a provision should be included that explains how the articles of incorporation can be amended. It is common to require prior notice of the proposed change, and a supermajority vote, such as a 2/3 vote of a quorum of the directors. The articles may also require prior notice and a supermajority of a membership vote if the articles give that right to the membership. The articles should be very specific, and define the quorums needed. Articles should not be amended easily because they could change the fundamental purposes of the corporation. Any amendments must be filed with the state, and changes that could affect the requirements involving the corporation's nonprofit status may need to be approved by the IRS. The procedure to amend the <u>bylaws</u> similarly should be addressed in the bylaws document, but because bylaws must at all times conform to and carry out the purposes of the articles, bylaws amendments generally are not required to be filed with the state or approved by the IRS.

Final comments on drafting articles of incorporation. It is best to concentrate first on those provisions that are mandatory from both the state and IRS points of view. The articles should also contain state-allowed provisions that provide additional protection for the nonprofit corporation, and its directors, officers, and members. The articles of incorporation are without a doubt of the highest importance. It is a public document and will be referred to often. Its provisions generally are not repeated in the bylaws. In fact, it is best not to cover the same topic in both the articles of incorporation and bylaws to avoid unintended conflict between them.

Previously adopted constitutions and bylaws prior to incorporation.

Some amateur radio clubs, particularly older ones, have both a constitution and bylaws as separate documents. This is common for unincorporated voluntary associations and for clubs that started out as unincorporated associations but later became corporations. In the case of unincorporated voluntary associations, the "constitution" contains the most important provisions. The "bylaws" fill in the management details. A "constitution" usually is harder to amend than the bylaws.

For the clubs that started out as a voluntary organization with a constitution and bylaws but subsequently filed articles of incorporation, regardless of what the constitution and bylaws are called and whether they are stated altogether in one or divided into two documents, these legally become "the bylaws" under most states' nonprofit corporation laws because the articles become paramount.

Types of 501(c)(3) classifications: Public Charities and Private Foundations

Many are surprised to learn that within the section 501(c)(3) classification there is a further division: (1) public charities and (2) private foundations. An amateur radio club most likely will qualify as a public charity. The reason for these two divisions is that private foundations are funded by a single or a few large donors. There is a belief that private foundations pose a greater risk that the nonprofit will benefit its large funders, and not the general public at large. If the Section 501(c)(3) organization is classified as a public charity, it is believed that the organization is more likely to benefit the general public and not a select few.

There are three main ways a nonprofit corporation can qualify as a public charity under Section 501(c)(3). (1) Certain types of organizations automatically qualify. Unfortunately, amateur radio clubs are not among them. (2) Certain "supporting organizations". These are Section 501(c)(3) organizations whose main function is supporting another nonprofit organization. This also is not normally applicable to amateur radio clubs. (3) The third way, and the one that is applicable to amateur radio clubs is the "public support test." This requires the nonprofit organization to have an income stream that is diverse and broad-based.

The broad-based income test can be found under Section 509(a)(2) of the Internal Revenue Code. The test requires the club to receive more than one-third of its support from contributions from members, the general public, and/or from activities related to its tax-exempt purposes. Membership dues, fees for classes, and amateur radio flea market proceeds are examples. If the organization starts to receive one-third or more of its support from investment income and unrelated business taxable activities, the organization will lose its public charities designation. See an accountant immediately about an alternative way to retain the club's public charities designation if this happens. Section 509(a)(1) of the Internal Revenue Code needs to be consulted. Corrective steps can be taken under this Code section over the next five years that may permit the organization to keep the club's public charities designation.

The Order of the Steps in the Application Process

Before you can file an application for tax-exemption status, the organization must obtain an employer identification number, or EIN, if it does not already have one. Getting an EIN does not require your organization to have employees. In fact, one of the questions on the EIN application, the Form SS-4, is a declaration of whether or not your organization will have employees. Think of it as a federal taxpayer ID number for your organization. The process is simple, and you can even apply for it online on the IRS website. An EIN can be obtained and the letter granted and printed out in minutes. It should be the first order of business after your incorporation application has been accepted, and you have proof from the secretary of the state that you have established your separate legal existence as a corporation.

Next, keep in mind that filing with the IRS for recognition of tax-exempt status should be done within 27 months after the effective date of incorporation. If you meet this deadline, the determination of tax-exempt status will be retroactive to the date of incorporation. If you file after this deadline, the IRS will not recognize the tax exemption status retroactively unless a special request is made. If you make such a request, you will have to explain why it took so long to file. Otherwise, the tax-exempt status becomes effective on the date the application is filed with the IRS. It is a good idea to have some proof of when the application was filed, such as a printout of an electronic confirmation, or a receipt from a private courier or certified mail submission if the application is mailed to the IRS.

Once you are incorporated and have the EIN, you can start the application process. Section 508(a) of the Internal Revenue Code sets forth the requirements to apply for tax exemption. An organization seeking 501(c)(3) recognition as a public charity historically has been required to file a Form 1023. Form 1023, however, is daunting. It has over 10 pages of questions, plus schedules. Fortunately, there is a relatively new option available for "smaller" organizations, Form 1023-EZ. This "EZ" form is two and a half pages, and it can be submitted on-line. Fortunately, most amateur radio clubs should be able to apply using Form 1023-EZ.

The club can use Form 1023-EZ if it declares that it (1) Will have less than $50,000 in revenue each year for the next three years, and (2) That it currently has less than $250,000 in assets. Not only is Form 1023-EZ a great simplification for small nonprofits, but the filing fee is also reduced. As of this writing, the EZ fee is $275. The fee for filing the full Form 1023 is $600.

The Form 1023-EZ has is a checklist of 24 yes-or-no questions, which must be answered "no" in order to use the "EZ" form. Keep in mind that Form 1023-EZ is designed only to determine how the organization will conduct itself to comply with the requirements of Section 501(c)(3) of the Internal Revenue Code. Unlike Form 1023, Form 1023-EZ does not describe or require a copy of the actual organizational documents that were filed with the secretary of the state. However, you must still be sure that the organizational documents you did file with the secretary of the state have the provisions that the IRS ordinarily requires. The IRS can at any time require the club to provide these documents for its review, even after the club has received its determination letter and commenced its activities.

<u>Maintaining and protecting your nonprofit corporate status</u>

Filing annual reports with the state's secretary of the state.

Most states require an annual filing of a report with the state's secretary of the state office. Connecticut, as an example, requires the filing of an annual report and requires an update of officers and directors, the agent for receiving official notices, and whether there has been a change in the nonprofit corporation's official address. Most states provide for filing annual reports on-line. Failure to file the annual reports after a certain number of years may result in your corporation being administratively "dissolved." Check with your state's office of the secretary of the state for reinstatement procedures.

Filing Form 990-type informational returns.

If your club has received a nonprofit determination letter, the club will be required to file a Form 990 annually. Many clubs are allowed to satisfy this requirement by the filing of a Form 990-N, which is sometimes referred to as the “e-postcard.” This informational return is for nonprofit organizations with annual gross receipts of $50,000 or less, averaged over the last three years. Technically, this is not a tax return because no tax will be owed. Rather, the return is informational only. The filing deadline is the 15th day of the fifth month following the last day of the tax year. For most clubs, their tax year runs January 1 – December 31, so the deadline would be May 15. There is a way to request an automatic extension for six months by filing Form 8868, but the extension would need to be filed by the original deadline. Caution! Failure to file a Form 990-N or other version of the Form 990 series for three consecutive years will automatically cause the organization’s tax-exempt status to be terminated. If you want to check the status of your club’s tax-exempt status, this information is publicly available on the IRS website at https://www.irs.gov/charities-and-nonprofits

Organizations that were eligible to file Form 990-EZ or 990-N (e-Postcard) but failed to do so for three years, and it has been 15 months or less from the date of revocation, may have their tax-exempt status retroactively reinstated to the date of revocation if they have not previously had their tax-exempt status automatically revoked. The organization would need to complete and submit Form 1023 , Form 1023-EZ, Form 1024 or Form 1024-A (the latter two forms are used for Section 501(c)(4) organizations) with the appropriate user fee Again, this procedure is available if the reinstatement is sought no later than 15 months after the later of the date of the organization's Revocation Letter (CP-120A) or the date the organization appeared on the Revocation List on the IRS website.

The IRS will not impose a Section 6652(c) penalty for failure to file annual returns for the three consecutive taxable years if that is what caused the organization’s exempt status to be revoked. The organization will be retroactively reinstated under this procedure if it files properly completed and executed paper Forms 990-EZ for all such taxable years. To make it even easier, for any year for which the organization was eligible to file a Form 990-N, the organization is not required to file a prior year Form 990-N or Form 990-EZ to avoid penalties. The organization should write "Retroactive Reinstatement" on their Forms 990-EZ and mail them to:

Department of the Treasury
Internal Revenue Service
Ogden, UT 84201-0027

There are more involved procedures if reinstatement is sought more than 15 months after the exempt status has occurred. See https://www.irs.gov/charities-non-profits/charitable-organizations/automatic-revocation-how-to-have-your-tax-exempt-status-reinstated . Avoid being automatically revoked – file annual returns!

Unrelated business Income filings.

If the club has received unrelated business income, which is commonly referred to as "UBTI" ("unrelated business taxable income"), the organization must file annually a Form 990-T. This return must be filed for any year when the organization's gross UBTI is $1,000 or more. UBTI may result in a tax being owed if there are not offsetting deductions. Fortunately, Section 513 of the Internal Revenue Code does not include donated volunteer time, virtually all of the proceeds from the sale of goods that have been donated to the organization, the distribution of low-cost articles such as coffee cups, hats and pins, income from convention or trade-show activities that are related to the organization's exempt purposes, and income from legal, traditional bingo in states where the games are ordinarily not conducted on a commercial basis.

Your state may also require the nonprofit to file its own Form 990. The Connecticut Department of Revenue Services cleverly calls its form the CT-990-T because it also taxes exempt organizations' unrelated business taxable income. Your state's laws and forms will vary.

D&O and general liability insurance

Finally, it is important to consider the topic of club insurance. Directors and officers of nonprofit organizations in many states enjoy special protections from legal liability. Earlier in this paper there was information about so-called "good Samaritan" laws that shield directors and officers from legal liability if they volunteer their services and serve organizations that are recognized by the IRS as nonprofit. But even if you have been sued and appear to qualify for this special protection, it is likely a claim must be answered and the defense made in court. And who is going to pay for that? One of the recommended provisions in a nonprofit corporation's articles is an indemnification provision, which pledges the nonprofit to defend that lawsuit. However, the best way to give your board and officers comfort is for the club to have directors and officers (D&O) insurance.

The ARRL's from insurance company selected to provide equipment and general liability insurance to clubs and ARRL members is also equipment with the expertise to support a club's D&O insurance needs. Your own independent insurance agent is another resource.

Most individuals are familiar with the ARRL's equipment insurance program that covers individuals' equipment losses due to theft or accidental destruction of their amateur radio equipment. There is another program for ARRL-affiliated clubs. It provides general commercial liability insurance tailored for amateur radio clubs.

In Conclusion.

The importance, scope and breadth of amateur radio clubs and their activities are increasing. The role they will play in preserving, protecting and enhancing the amateur radio service in the future is critical. To those who serve in leadership roles in our clubs, heartfelt thanks is owed to you by all radio amateurs. I hope this paper has been informative and will help you consider the present and future structure of your own amateur radio clubs. – **Δ**

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