

July 30, 2019

Registry of Charitable Trusts
P.O. Box 903447
Sacramento, CA 94203-4470

RECEIVED
Attorney General's Office

AUG 13 2019

Registry of
Charitable Trusts

VIA U.S. MAIL

Re: Courtesy Notice of Sale of Assets - Amateur Radio Digital Communications.

To Whom It May Concern:

The purpose of this letter is to set forth a description of the recently completed sale of significant assets (but not substantially all of the assets) of Amateur Radio Digital Communication, a California nonprofit public benefit corporation ("ARDC"), to Amazon Technologies, Inc., a Nevada corporation ("Amazon") (the transaction referred to herein as the "Sale"). This letter serves as a **courtesy notice** of the Sale, which was a sale of Internet Protocol Addresses ("IP Addresses").

While the Sale is of substantial size in relation to the prior reported assets in ARDC's past information returns, the Sale represents only about one-quarter of ARDC's IP Addresses and is therefore not a sale of substantially all of ARDC's assets. Accordingly, advance written notice of this Sale was not required under California Nonprofit Public Benefit Corporation Law Section 5913. The revenues from the Sale will be accurately recorded in ARDC's 2019 Form 990, which will be timely submitted to the Registry along with the 2019 Form RRF-1.

Background:

Every organization, person, or device attached to the Internet must have an IP Address in order to function as part of the network. Initially plentiful and freely available at no charge, in the past decade these have become scarce and their availability subject to market forces.

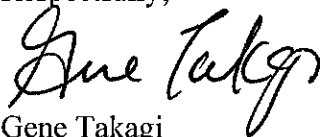
In the 1980's, when the Internet was in its infancy, interested parties were given large numbers of IP addresses at no cost by the Internet Assigned Numbers Authority ("IANA"), an agency of the US Government, without restriction. It was only necessary to explain that one wanted a block of addresses to research and experiment with the new evolving network and they would be made available. At the time, a simple telephone call [email

To help assure that fair market value was received by ARDC for the Sale, ARDC conferred with several Internet Address Brokers who opined that the market for such assets is volatile and offered prices vary considerably from day to day. In February of 2019, ARDC engaged a well-known and highly respected Internet Address Broker, and instructed the Broker to offer the block of approximately 4 million IP Addresses for sale, with some constraints, to the highest bidder. Very few prospective buyers would have the resources to make such a purchase, so the selection and use of a Broker was critical to access the market.

This courtesy notice to the Registry is again not required but offered to provide advance context for ARDC's 2019 Form RRF-1 and 2019 Form 990, which will reflect a substantial growth in its size.

If you need further information or have any questions, please feel free to contact me.
Thank you.

Respectfully,

A handwritten signature in black ink that reads "Gene Takagi". The signature is written in a cursive, flowing style.

Gene Takagi
Attorney for Amateur Radio Digital
Communications