

1. (untitled)

1. Submissions from this consultation process may be made public. Please indicate here if you would like your submission to be kept private.

I am happy for my submission to be made public

2. Which of the following best describes the perspective your submission represents?

Employee

2.

3. Is this a group or individual submission?

Individual

3. (untitled)

4. Individual

12. (untitled)

5. Would you like to provide any comment on the case for change?

Thanks for the chance, as a DNCL employee, to comment on the InternetNZ Organisation Review proposal.

I have some comments on the higher level thought behind this proposal, and also some comments on how it would affect the functions DNCL currently performs.

The working group has acknowledged a key concern throughout any change is continuity of operation.

It suggests that the InternetNZ Council structure needs to be reviewed, however, for continuity, the Council will remain in place while a bottom-up restructure is implemented.

This is counterintuitive, as it is the DNCL and NZRS staff and Boards that have the day-to-day operational and decision making roles in managing the .nz domain name space. Council do not have operational management or knowledge of these operations.

Changing the operational boards and organisations, before reviewing Council's makeup is inconsistent with the statement of safeguarding continuity, it is also inconsistent with the 'specific principles' outlined in the Organisational Review Change Proposal, regarding engaging professional directors to provide independent, specialist perspectives to the governance of the group.

Given it is acknowledged that the InternetNZ Council structure should also be reviewed, it would make more sense for this to be done first. This would leave a presumably more effective council, making any further organisational review decisions. Perhaps with Council being made up of elected representatives and appointed directors, to ensure the 'specific principle' referred to above.

Currently DNCL has the ability to make responsive regulatory and compliance decisions, unhampered by the other organisations', sometimes conflicting, missions or goals. Policy decisions can be made with

recourse to the DNCL board, in an agile, independent manner.

DNCL has very specific goals, and knows its roles, in setting .nz policy, and regulating the .nz domain name space. Some of these roles contrast with the other organisational roles, such as business development or advocacy and lobbying.

It is not stated how merging all three organisations into one would clarify DNCL's roles, or aid its ability to continue fulfilling its operations. From a staff level, operational point of view, the proposed all-in-one structure would be of detriment to its general operation.

The staff presentation read that "people value the independence of .nz policy and regulation", however then proposes that this independence be removed, with an 'advisory group' put in place. An advisory group, by its name, lessen the current, valued, independence. It is also contrary to the 'specific principles' mentioned earlier regarding ensuring the independence of .nz policy and management of registrars.

The proposal advises that having a 'single face' will allow us to be more responsive to stakeholders, and provide clarity and consistency. A single face has drawbacks, as DNCL works with government, registrars, and organisations that InternetNZ's advocacy and lobbying side, often speaks out against. This has the potential to damage these working relationships. It is worth noting that other all-in-one ccTLDs do not perform the same advocacy work that InternetNZ does.

One entity, covering three different roles, is likely to require much more inward focussed effort to fulfil these, as different missions will cause internal conflict, with one CE having to make decisions based on, often conflicting roles, of the one organisation. Such internal conflict would make an organisation less agile and less able to take actions and make key decisions.

Staff were advised that this is a transparent review, however this does not appear to be the case, as staff were not supplied detailed research into the options that council considered. While change is needed, it is concerning that such a drastic overhaul of the current structure is suggested, without any research or real depth reasoned argument, why other options were not considered.

13. (untitled)

6. What do you think are the strengths of the proposal to merge the three organisations into one, governed by one Council?

7. What do you think are the limitations of the proposal to merge the three organisations into one, governed by one Council?

15. (untitled)

8. Do you have any comments on the proposed approach to protecting the independence of .nz policy and regulation?

16.

9. Do you have any comments on the proposed two-phased approach to bringing the three organisations together?

10. Do you have any comments on the proposed interim organisational structure (figure 2, page 11 of the consultation document)?

11. Do you have any comments about the impact of the proposal on current positions? Please be clear about which role(s) you are referring to when providing feedback

12. Do you have any comments about the proposed new Chief Executive role?

17.

13. Please provide any comments on the consultation process and timeframes

18.

14. Please provide any comments on the change protocols, including the selection, redeployment and recruitment process

19. (untitled)

15. Do you have any other comments you would like to make?