

## **Public Submission by Caleb Smith, Support Analyst on the proposed structural changes to the InternetNZ Group to be published on the InternetNZ website**

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### **Introduction**

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I would like to thank the InternetNZ Council members and others involved in the consultation for the opportunity to engage in the second round of submissions.

This submission is tendered as a staff member of the Domain Name Commission Ltd. I have been in my role for just over three months.

### **Organisational changes**

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I am pleased to see some of the alterations in the proposal since the first consultation went out. I support keeping the DNCL separate from the rest of the group. As an industry regulator, I believe this is important to be able to run an effective compliance regime, with the ability to sanction industry bodies if required. The potential for a conflict of interest that would arise from a single InternetNZ body would be too great, considering the advocacy function that InternetNZ currently performs.

Additionally, I believe it is important for the senior manager of the independent DNCL to retain the Commissioner title. The Commissioner title has a significant reputation in the industry, and would give the senior manager of the DNCL more legitimacy when working with their peers across the regulation and compliance space.

It is also positive to see that the new group CE role will be advertised externally. The new role will be significant and complex, given the size and function of the group as a whole. It is common sense that we cast the net wide when finding the right talent for this position.

With respect to the policy-setting function of the DNCL, I could see this being workable as either a function of the new InternetNZ group, or staying as it currently does as part of the DNCL's work. There would be positives and negatives for both models. InternetNZ is already well situated to operate a public consultation, given the existing social media and general internet presence the organisation possesses.

Ensuring the policy making process as a whole is helmed in an impartial, independent manner will be key in ensuring positive outcomes. In order to achieve this, I believe the responsibility for the policy-setting should be held by a majority of independent professionals to ensure no potential for conflicts of interest. I believe this can be achieved regardless of where the policy-setting sits.

In conclusion, I believe the current revised organisation document is better in several ways than the original document, but could do with some additional minor revisions.

