

**Submission from Domain Name Commission Limited Staff; Josh Cookson, Dylan Connolly, Cristy Cable, Henry Williams and Caleb Smith.**

We, as the Domain Name Commission Limited staff welcome the revised consultation keeping Domain Name Commission Limited as a separate legal entity, for the reasons set out in our original submission to the organisational review. We thank the Working Group, The Council, their Boards and those others who have contributed to the review to date. Below are our thoughts from the perspective of the Domain Name Commission Limited and its mandate and workload. Personal submissions may come from staff members covering their views on a wider perspective.

**Domain Name Commission Limited Structure**

The staff believe that the Domain Name Commission Limited senior manager should retain the Commissioner title, which should see the current and recently hired Chief Operations and Policy Officer appointed as the person best suited to fill this role, as the current Commissioner is outgoing. We see the retaining of this title as an essential step to ensuring that the role and the organisation are to be on equal footing with counterparts in other groups that we engage with, along with giving the position the authority needed to ensure role legitimacy in the wider dispute resolution and compliance industry.

Recently, as noted by the Council in the presentations given to staff, Domain Name Commission Limited has been through a restructure. This restructure put in place a clear second-in-charge with a flat structure reporting to that role. DNCL's structure should retain a second-in-charge role for situations where the senior manager is unavailable. That position could be well covered by Domain Name Commission Limited staff, with recourse to one of the independent Domain Name Commission Limited directors, retaining independent decision-making ability.

**Policy Setting Function**

We agree that policy should have a separate decision-making body, rather than the InternetNZ council entire, however, have some suggestions for the implementation of this.

While the decision may be made to move the policy function from Domain Name Commission Limited to InternetNZ, we do not see any need to move this immediately. Given this is not a full-time role, covered by one staff member, but a team effort, this may not be the most straight forward transition. We suggest it may make the transition easier, if Domain Name Commission Limited carries on with its policy role shortly, with the new InternetNZ CE deciding on how to internalise it after the more substantive changes have been made with InternetNZ internalising NZRS, and the governance structures have been settled.

Given the InternetNZ CE would sit on the Domain Name Commission Limited Board, this would give group input into any policy changes before they went to the Policy Advisory Committee. That way, this process would give the added benefit of two professional directors reviewing any policy changes before they went to the policy advisory body.

We again, thank all of those involved in this important process and taking the time to consider the feedback from staff.