InternetNZ Group - Feedback on change proposals

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?

Member

4.

3. Is this a group or individual submission

Individual

5. (untitled)

4. Individual

Name : Matt Brown
Title : InternetNZ Member
Organisation : N/A

11. (untitled)

5. If you would like to be kept informed of final decisions, please provide a contact email address

12. (untitled)

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

The case for the specific proposed change is weak and not well supported. The top-line numbers around governance and decision making/agility are certainly convincing enough to support the review and the consultation, but the supporting documentation (even with the recent release of the original report) does not adequately develop the options available or the pros/cons of each to enable a decision to be reached. It certainly does not provide justification that the costs and risks of embarking on such a major change outweigh the costs (including opportunity costs) of staying with the present structure.

13. (untitled)

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

Reduction in governance overhead and agility in decision making ability are clearly good outcomes to achieve - a single organisation is inherently going to have an easier (but not guaranteed) ability to make this successful. Presumably there is also a cost saving aspect, in having less redundancy in the governance and senior leadership roles. This is potentially beneficial, but it's unclear if this is significant enough to be material or motivating to the proposal.

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

The significance of the regulatory/policy function performed by the DNC does not appear to be appropriately recognised - an independent policy group is proposed, but how this would function and the ability of such a group to adequately discharge the policy/regulatory functions is not examined or proven in any way. The current structure is acknowledged to be performing well and took time to arrive at, the key challenges or problems presented (e.g. decision making agility) are not obviously closely related to the DNC which by nature deals with relatively static policies which do not require rapid or agile change processes - e.g. agilty seems to be far more applicable between InternetNZ and NZRS alone. Given these two understandings the risk of merging DNC into a single organisation is in no way justified by the presented options and data.

14. (untitled)

9. Do you have any suggestions on how to address these limitations?

Fundamentally a more detailed change proposal would be required - including demonstration that the necessary independence and governance/regulatory functions could be adequately discharged under the proposed structure.

15. (untitled)

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

As previously noted it is insufficiently developed and proven. The proposed benefits of the change do not justify risking what has been achieved in this area for a structure with such unproven ability to deliver.

19. (untitled)

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

Overall I do not support the proposed changes. While it is commendable that the council is looking to the future and wanting to optimise the organisation, not just stand still, the currently released documentation does not support or make the case for the change proposed to the level of confidence required. This is particularly pertinent given the organisation is already high functioning - the bar for any proposed change to meet is higher than it would be if the organisation was struggling. I think the council has jumped a step in going straight to a proposed change. Specifically the identification of issues and desired outcomes is being mixed with a proposal of how to achieve them. I suggest the council should have released the first half of the initial paper from the working group with a description of the perceived challenges and desired outcomes for consultation, it would have enabled this feedback to be received, and further development of the proposed structure and options to have taken place before a concrete proposal was made - which would have allowed the proposal to more clearly demonstrate how it would achieve the aims and mitigate the risks. This path is still open to the council, simply by pulling back on making a decision to change, and refocusing the working group on developing and proving the ability of the proposed model to achieve the desired goals. It is clear from the existing feedback received that there is significant input and discussion from the affected stakeholders that needs to be taken as input into this process that has not yet occurred. I urge the council to take this path rather than rushing into a change that may significantly harm the organisation in the long term.