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

3. Is this a group or individual submission
   - Individual

4. Name: Peter Harrison
   Title: Director
   Organisation: Devcentre Limited

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

6. Would you like to provide any comment on the case for change?
   When bringing together multiple organisations the real key is whether the objects of the respective organisations are sufficiently aligned.

   Since I am not familiar with the other organisations I would have appreciated a more detailed rundown of what their objects are and what the ultimate set of combined objects would look like.

   Specifically I would be concerned that the organisation step away from the social good aspects such as promoting a free and open Internet towards a role simply managing Internet infrastructure.

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

8. What do you think are the limitations of the proposal to merge the three organisations into one, governed by one
Council?
It is so full of business speak it is difficult to interpret what the proposal is saying.

It is unclear to me what the role of the other organisations are, what their objects are, and thus whether it is appropriate to merge them into a single entity.

My concern is that if it is simply a merger of multiple interests that is would dilute the individual focus each organisation brings. On the other hand if they are well aligned it would allow reduction of duplication in terms of management.

In other words everything really hinges on how the separate objects merge into one, where they have commonalities, where there are differences, and what accommodations will be made.

14. (untitled)

9. Do you have any suggestions on how to address these limitations?
As a former President of the NZOSS and current President of the NZARH I appreciate the case for reducing duplication of services among organisations that operate in similar fields. However, there are alternatives such as shared services rather than creating monolithic organisations.

In fact reading the case for a merger it does not seem obvious how an organisational merger will aid, and in fact the process of a merger may in fact harm many of those objectives. Becoming more outwardly focused is more about organisational culture and leadership than structural concerns in my view.

15. (untitled)

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

19. (untitled)

11. Do you have any other comments you would like to make?
From a quick review it appears that this proposal has not strongly tied the proposed plan of action to the issues that are underpinning the case for change.

Perhaps I am most concerned about the tension being a semi-regulatory body that manages infrastructure and must be impartial, and a body which takes an active interest in the social good of that infrastructure. By merging it may make this tension worse, and reduce focus rather than improving it.

Also, please learn to communicate without buzzwords. We all want to 'optimise our strategic resources to deliver maximum stakeholder value' - but this isn't communicating.

Having been involved with a similar proposal recently I see a commonality; people trying to sell a case for something rather than laying out the facts in a way that clearly shows the reasoning behind the proposed strategy, along with the downsides.

As a member of InternetNZ I am unconvinced by the proposal. That does not mean it is the wrong decision, just that the proposal failed to convince that this is the right approach.