

From: [Benjamin Farrow](#)
To: [OCI Company Licensing](#)
Subject: Proposed Acquisition of Control of Delta Dental of Wisconsin, Inc. and Wyssta Insurance Company, Inc.
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To whom it may concern:

The restructuring of “Delta Dental System” (DDWI) as a subsidiary of holding companies 1962 Holdings, Inc and GreenCo Holdings, Inc. is “contrary to the interests of the insured.” While the review this transaction with regards to the “five part test” outlined in Wisconsin Statute s. 611.72(3)(am) may present no legal challenge, the motivation for this restructuring remains suspect and the patient-related impact unaddressed.

The acquisition of Cherry Tree Dental practices by DDWI was without precedent in the state of Wisconsin. Most of the public comments for this hearing express the widespread concern with the ownership of dental practices by an insurance company. As a dentist who has experienced the cost-cutting measures and coercive tactics that DDWI employs within the marketplace, I firmly agree that there are likely conflicts of interest when an insurance company becomes both health care provider and insurance payer. I ask that the OCI maintain a standard that protects not only the entities and shareholders involved in the merger, but also protects the patients impacted by this transaction.

This re-organization is designed to create independence between DDWI and Cherry Tree Dental. By proposing this restructuring, DDWI acknowledges that independence is necessary to protect patients from conflicts of interest. If independence is what is required, this restructuring is a smoke screen.

The executive leadership of both DDWI Inc. and Wyssta, Inc. in the proposed restructuring is composed of a nearly identical membership. Conflicts of interests will remain as long as a single leadership team manages both the provision of health care and payment for these services. DDWI will maximize profits of its insurance operations and Wyssta, Inc. will maximize the profits of its operations including the management of the Cherry Tree Dental practices. What assurances can they provide that the negotiations around benefits, provider contracting, and fee schedules will be conducted equitably? Since the operations of both will be accountable to the same parent company, patients of these practices will lack an independent provider to advocate for fairness and patient autonomy in their care.

If this restructuring is intended to create a “firewall” between the insurer (DDWI) and the health care providers (Cherry Tree Dental), the proposed executive leadership is inadequate to protect patients’ interests. Approving this restructuring as it is proposed is a de facto approval of future acquisitions and the operation of dental practices by insurance companies that also act as payer. This transaction and restructuring sets a dangerous precedent that risks long-term denigration the provision of dental care for patients in Wisconsin and should be considered beyond the requirements of Statute s. 611.72(3)(am).

Sincerely,

Benjamin Farrow, DDS, FAGD



A patient practice

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