

September 28, 2025

Submission to the Office of the Commissioner of Insurance

Introduction

I am submitting this information to assist the Commissioner in evaluating the context of the October 2, 2025 hearing on the Proposed Acquisition of Control of Delta Dental of Wisconsin, Inc. and Wyssta Insurance Company, Inc. The following analysis summarizes the most recent market and demographic data available regarding dental insurance coverage in Wisconsin.

Delta Dental's Market Position

According to Delta Dental's own website, the company serves over **2.6 million Wisconsin residents**. Delta Dental of Wisconsin (DDWI) sells dental insurance directly to employers and individuals, while its subsidiaries include:

- **Wyssta Insurance**, which markets DeltaVision® benefit plans in Wisconsin; and
- **Wyssta Services**, which administers individual and family dental plans in Wisconsin as well as to Delta Dental member companies in 12 other states.

Delta Dental also highlights its extensive provider networks:

- **Delta Dental PPO™** (largest discounts to members), and
- **Delta Dental Premier®** (broader access, smaller discounts).

Combined, these form the **PPO Plus Premier™ network**, which includes **90% of providers in Wisconsin** (compared to nearly 80% nationally).

Wisconsin Demographics and Coverage

Wisconsin's population is approximately **6 million**. Estimates for 2023–2024 place the figure between 5.9 and 6 million, compared with the U.S. Census count of **5,893,718 in 2020**.

Coverage varies by age group, according to the American Dental Association (ADA):

- **Children (0–18)**: 53% private dental benefits; 38% Medicaid/CHIP; 8% uninsured.
- **Adults (19–64)**: 62% private benefits; 16% public benefits; 22% uninsured.
- **Seniors (65+)**: 33% private benefits; 12% public benefits; 56% uninsured.

Population by Age Group (latest available estimates):

- **Children (0–18):** ~1.25 million
 - ~662,500 with private coverage
- **Adults (19–64):** ~3.46 million
 - ~2.15 million with private coverage
- **Seniors (65+):** ~1.17 million (19.6% of the state’s population as of July 1, 2024)
 - ~386,100 with private coverage

The senior population is the fastest-growing age segment in Wisconsin.

Market Share of Delta Dental

Dental insurers only compete within the **private coverage market** in Wisconsin, which includes approximately **3.2 million residents**. Of these, Delta Dental covers more than **2.6 million individuals**.

This equates to an estimated **81.25% share of the private dental insurance market** in Wisconsin.

Summary

- Delta Dental controls the overwhelming majority of Wisconsin’s private dental insurance market.
 - Its network participation rates and ownership of Wyssta position it as the dominant insurer, and also as a key player in vision coverage and administrative services.
 - Delta Dental’s market share exceeds **four out of every five privately insured residents**, underscoring the competitive concerns relevant to the Commissioner’s review.
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Respectfully submitted,
Christian Marsh, DDS