

From: [Mouhab Rizkallah](#)
To: [OCI Company Licensing](#)
Subject: Proposed Acquisition of Control of Delta Dental of Wisconsin, Inc. and Wyssta Insurance Co, Inc.
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Dear Ms. Amy Malm & Commissioner of Insurance,

I am a dentist in Massachusetts, and I am writing against allowing Delta Dental of Wisconsin's (DDWI) acquisition of Cherry Tree dental (or any dental practices).

The goal of an insurance company is to maximize profits. They currently do this by denying approvals for care, minimizing reimbursements, bundling of procedure codes, limiting annual spending maximum's for patients, obstructing non-network doctors access to insurance information, and other tactics. The result is that the provider network shrinks because doctors are not willing to participate under these conditions.

As the network shrinks, the insurer increasingly struggles to convince corporate and individual insurance buyers to purchase their plan.

Rather than improve their plans, it appears that DDWI has instead chosen to solve their network problem by becoming the network - a false fix.

The "creation" of this false network is a willful consumer scam, in which the dental insurance buyer (corporation, group, or individual patient) believes they are going to an office that has their best interests in mind, but instead the office operates with this conflict of interest: **"The less they diagnose for Delta Dental of Wisconsin patients, the less they spend."**

Dentists should not be put in a position to be pressured by this conflict of interest. While those Cherry Tree Dental dentists may continue to treat patients from any insurer, or no insurer for that matter - For Delta Dental of Wisconsin patients, the fact remains - **"the less they diagnose, the less they spend."**

In Healthcare, the rubber really meets the road in avoiding conflicts of interest (not resisting them). This model is ripe for corruption, and such vertical integration is antithetical to the unconflicted provision of health care.

While I am located in Boston - far from the epicenter of this Wisconsin problem, I am very knowledgeable about dental insurance tricks, and I personally wrote MGL 176X (the first Dental Loss Ratio in the nation), and I welcome you to engage me on the subject of installing a dental loss ratio in Wisconsin, so as to protect against unfair business practices such as the conflict of interest in DDWI acquiring Cherry Tree Dental.

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