

From: [Nick Romenesko](#)
To: [OCI Company Licensing](#)
Subject: Proposed Acquisition of Control of Delta Dental of Wisconsin, Inc. and Wyssta Insurance Company, Inc
Date: Wednesday, September 17, 2025 4:24:06 PM

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To whom it may concern,

My name is Dr. Nick Romenesko and I am a 2009 graduate of Marquette University School of Dentistry. I am writing in opposition to the Acquisition of Cherry Tree Dental by Delta Dental of Wisconsin OCI Case Nos. 25-C46628 and 25-C46629.

I am writing to express my strong opposition to Delta Dental's recent move to acquire Cherry Tree Dental—a large chain of dental offices. This development is a serious red flag for the future of dentistry, patient care, and fair market practices in our state.

Over the past few years, an increasing number of dentists have left the Delta network out of frustration with its stagnant fee schedules, lack of transparency, and unilateral control over reimbursement rates. Many of us believed that our power, as licensed dental providers, came from our ability to walk away from unfair contracts—thereby pushing Delta back to the negotiating table. That dynamic depends on a level playing field.

But this acquisition changes everything.

By owning a network of dental offices through Cherry Tree Dental, Delta is sidestepping the rules entirely. They will no longer need to negotiate with independent dentists because they'll control their own in-house provider network. Worse, they can strategically open offices near independent practices and manipulate reimbursement rates—favoring their own clinics while undercutting nearby competitors. Cherry Tree Dental won't need to operate at a profit; they'll function as a loss leader to help Delta Dental retain more capital and exert more control over the marketplace.

This creates a dangerous dynamic:

Delta will be both payer and provider.

They'll set the rules and benefit from them.

They'll compete with private dentists while not playing by the same rules.

As a non-profit, Delta Dental already operates outside the standard "usual and customary" fee structures that govern other insurance companies. This allows them to reimburse significantly less than the expected rate, particularly for out-of-network providers. I've intentionally kept my fees low so that I can avoid Delta's unreasonably low write-offs—but many providers don't have that flexibility and are forced to absorb

unacceptable losses. When other insurers say they cover 100% of a procedure, they do. Delta often pays far below that, distorting both provider compensation and patient expectations.

The consequences of approving this acquisition go far beyond our state. If allowed to proceed, it will set a national precedent—one that invites every insurance company in America to follow suit. Some states wisely prohibit non-dentists from owning dental practices to preserve professional integrity and protect patients from corporate interference in healthcare decisions. If Delta Dental is permitted to both control reimbursement and own the treatment centers, there will be little room left for independent clinical judgment—or independent providers at all.

Let's be clear:

This will not lead to better access to care.

This will not lower costs for patients.

This will not improve outcomes.

It will lead to more profit for Delta Dental, more control over the profession, and the commoditization of patients—who will become little more than cattle in an assembly line of procedures determined not by clinical need, but by corporate policy. Dentists will be reduced to employees of the insurer, and patient care will suffer.

I urge you to reject this acquisition and send a strong, clear message: insurance companies should not be allowed to own healthcare facilities. The integrity of the patient-provider relationship—and the future of dentistry—depends on it.

Thank you for your consideration.

Sincerely,

Dr. Nicholas Romenesko

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