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To: Subject: Proposed Acquisition of Control of Delta Dental of Wisconsin, Inc. and Wyssta Insurance Company, Inc Thursday, August 28, 2025 6:32:17 AM

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Office of the Commissioner of Insurance State of Wisconsin 125 South Webster Street Madison, WI 53703

To Whom It May Concern,

Re: Concerns Regarding Delta Dental's Acquisition of Cherry Tree Dental's Wisconsin-Based Practices

I am writing as a dentist concerned about the recent acquisition of Cherry Tree Dental's Wisconsin-based dental practices by Delta Dental. I respectfully request that the Office of the Commissioner of Insurance carefully review this transaction and consider the broader implications it may have on patients, providers, and the dental care market in our state.

As you know, Delta Dental is not just an insurer but now increasingly a player in care delivery through ownership of practices. This vertical integration raises several serious concerns:

1. Reduced Competition and Patient Choice

Delta Dental's acquisition of a significant number of practices under the Cherry Tree Dental umbrella could result in a near-monopoly in some regions. This limits patient choice and can potentially steer patients toward innetwork providers owned by Delta, whether or not they are the best clinical option.

2. Conflict of Interest

As both payer and provider, Delta Dental has a built-in conflict of interest. There is concern that such a model may prioritize cost-containment over patient-centered care. This could result in:

Pressure on providers to reduce treatment plans or limit services

Bias in insurance approval processes favoring Delta-owned clinics

Undue influence on clinical decisions

3. Provider Autonomy and Employment Practices

Many dentists and staff previously employed by Cherry Tree Dental may face changes to employment terms, reduced clinical autonomy, or increased production pressures. This could negatively impact the quality of care

4. Transparency and Regulation

There appears to be a lack of transparency around the terms and oversight of this acquisition. As a member of the public, I respectfully urge the Commissioner's office to ensure:

Full regulatory review of the acquisition for anti-trust concerns

Clear reporting on ownership structures and corporate relationships

Oversight of business practices that may affect access or quality of care

I trust that the Office of the Commissioner of Insurance will give this matter the serious consideration it deserves. Maintaining a competitive, ethical, and patient-centered dental marketplace is essential to the health of

Thank you for your attention to this important issue. I would appreciate any updates on how the OCI plans to address or review the implications of this acquisition.

Dr. David Ducommun

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