

From: [Emily Eckdahl](#)
To: [OCI Company Licensing](#)
Subject: Proposed Acquisition of Control of Delta Dental of Wisconsin, Inc. and Wyssta Insurance Company, Inc
Date: Monday, September 22, 2025 11:00:15 AM

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To Whom It May Concern,

RE: Proposed Acquisition of Control of Delta Dental of Wisconsin, Inc. and Wyssta Insurance Company, Inc

The following is an additional voice of concern regarding the proposed restructuring involving Delta Dental of WI (DDWI) and Cherry Tree Dental. I have read all other submitted statements on this issue and want to reiterate the same points as well as bring another concern to the table. This decision is not and cannot be viewed solely as a simple business restructuring; this decision has the capacity to influence the future of dentistry across our state and country for generations. This presents not only a business matter but an ethical dilemma, with the potential for harmful consequences to Wisconsin dental patients.

The first part of this restructuring involves DDWI converting from a service insurance corporation without members, to a service insurance corporation with members. Anytime a company restructures in this way, there is now a change in control, ownership and oversight. These need to be heavily evaluated through the proposed documents and discussions to ensure the insureds of DDWI are the top priority. Let's dive deeper.

According to Exhibit P, DDWI currently has 8 Directors and 7 Executive Officers on the board. This board is diverse in nature and most importantly, includes 2 licensed dentists. The single most important factor in the decision being made about this restructuring is if this will have negative effects on the insureds. According to Exhibit P, with the passing of this restructuring the dentists will be removed from the DDWI board and the board will now include only 6 individuals. The restated bylaws of DDWI also state that GreenCo Holdings Inc. will become the sole voting member for DDWI. When looking at the board makeup of GreenCo Holdings, there is no dentist present on this board either and it consists of essentially the same small number of members as the proposed DDWI board. **All patient centric and provider based concerns to the DDWI board will be removed and placed under 1962 Holdings, Inc. This represents a major concern, as the primary voice of the patients (i.e. dental providers) will no longer have a seat at the table and instead, their positions will be replaced by individuals concerned about the bottom line as a primary focus.**

This is a unique move as it will allow the company to appear to be dentist lead, with provider and patient concerns seemingly represented, but in reality, those concerns are now a multitude of steps and votes away from the DDWI decision making process.

This move could muffle the voices of patient concern within the dental insurance industry. With DDWI being the main insurer of patients in our state, we need to take these decisions into high regard. I wholeheartedly believe assuming the best without documented and legally enforceable oversight, will lead us to taking notes of negative results. I encourage the decision makers in this process to evaluate this restructuring not only from a financial and business viewpoint but also from an ethical standpoint with patient needs and concerns as the primary focus.

The following questions are ones I encourage you all to evaluate as you determine the outcome of this proposal.

- Were patient premium dollars used in the best interest of the patients?
- What impact could this have on patient care and patient premiums in the future?
- Is this restructuring a means of positioning DDWI for further consolidation in our industry?
- Does the proposed governance structure genuinely allow for dentist and patient perspectives to be reflected in votes and future decisions?
- Will this be a net positive decision for the insureds of Wisconsin?

Thank you all for your time and commitment to Wisconsin's future.

Sincerely,
Emily Eckdahl DDS