



September 19, 2025

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

Re: Delta Dental of Wisconsin's Acquisition of Cherry Tree Dental

Dear Commissioner,

The Alliance of Independent Dentists, representing independent dental practitioners throughout Wisconsin and nationwide, writes to express serious concern regarding Delta Dental of Wisconsin's (DDWI) purchase of Cherry Tree Dental. This transaction creates a conflict of interest by allowing the state's dominant dental insurer—covering over 2.6 million residents and contracting with more than 90 percent of Wisconsin dentists—to also own and control dental practices.

This vertical integration undermines fair competition and risks patient care. DDWI can now:

- Exacerbate conflicts of interest by combining insurer and provider roles.
- Limit patient choice by directing enrollees toward DDWI-owned clinics.
- Impose lower reimbursement rates on non-affiliated dentists, threatening their financial stability.
- Reduce transparency in network participation and claims processing.
- Override evidence-based clinical decisions with cost-cutting mandates.
- Dictate treatment protocols, limiting personalized care tailored to each patient.
- Diminish competition, risking higher costs and fewer care options for patients over time.

Such consolidation follows troubling patterns in healthcare, where insurer ownership of providers has led to higher costs, reduced quality, and the erosion of independent practices. In addition, DDWI's proposed restructuring maintains overlapping corporate and board structures.

It does not truly divest the insurer and leaves the core conflict unaddressed. The American Dental Association has already voiced strong concerns about this acquisition.

We respectfully urge your office to review this transaction and take appropriate action to ensure Wisconsin's patients and providers are protected from these harmful conflicts of interest.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jill A. Tanzi', with a large, stylized initial 'J' and a cursive 'A'.

Jill A. Tanzi, DDS

President

Alliance of Independent Dentists