From: pothfamilydental@wi.rr.com

To: OCI Company Licensing

Subject: Proposed Acquisition of Control of Delta Dental of Wisconsin, Inc. & Wyssta Insurance Company, Inc.

Date: Tuesday, October 7, 2025 8:24:05 AM

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Date: October 7, 2025

To:

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

Subject: Concerns Regarding Delta Dental's Acquisition of Cherry Tree Dental

Dear Commissioner,

I am writing to express my concerns regarding the recent acquisition of Cherry Tree Dental by Delta Dental Insurance, and the subsequent transfer of ownership through a newly formed entity. While I understand that Delta Dental created a separate company to mitigate potential conflicts of interest, I believe this transaction warrants deeper scrutiny due to its implications for competition, patient choice, and provider autonomy in Wisconsin's dental care market.

Delta Dental holds a dominant position as a dental insurer in our state. Its move to acquire a chain of dental practices—even indirectly—raises serious questions about vertical integration and market consolidation. The creation of a separate entity may appear to resolve conflicts on paper, but it does not eliminate the potential for undue influence over clinical decision—making, referral patterns, or reimbursement structures.

Key concerns include:

- **Reduced competition**: Independent dental practices may struggle to compete with a network backed by a major insurer, potentially leading to fewer choices for patients and providers.
- Patient care conflicts: Even with a separate entity, there is a risk that business interests could influence treatment recommendations or limit access to certain procedures.
- **Transparency and oversight**: The structure of the transaction and the governance of the new entity should be fully disclosed to ensure accountability and prevent regulatory loopholes.
- **Precedent-setting**: Allowing this acquisition without robust safeguards could open the door to similar insurer-led consolidations across other healthcare sectors.

I respectfully urge the Office of the Commissioner of Insurance to conduct a thorough review of this transaction, including the operational independence of the new entity, its financial ties to Delta Dental, and its impact on Wisconsin's dental marketplace. Public hearings and

stakeholder input—including from patients, providers, and consumer advocates—should be part of this process to ensure that the public interest is protected.

Thank you for your attention to this matter. I trust that your office will uphold its commitment to fair competition, ethical practice, and consumer protection in Wisconsin's healthcare system.

Sincerely,

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