

From: [Christian Marsh](#)
To: [OCI Company Licensing](#)
Subject: Proposed Acquisition of Control of Delta Dental of Wisconsin, Inc. and Wyssta Insurance Company, Inc.
Date: Friday, August 29, 2025 9:24:37 PM

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To: Office of the Commissioner of Insurance (OCI)
Re: Opposition to the Acquisition of Cherry Tree Dental by Delta Dental of Wisconsin
OCI Case Nos. 25-C46628 and 25-C46629

Dear Commissioner Malm,

I respectfully submit this statement in opposition to the acquisition of Cherry Tree Dental by Delta Dental of Wisconsin. As a practicing dentist and advocate for ethical standards in patient care, I believe this transaction poses a direct and lasting threat to the interests of insureds across our state.

Delta Dental of Wisconsin currently sets the reimbursement rates for dental procedures statewide. Dentists may contract as PPO or Premier Providers, each subject to predetermined fee schedules established by Delta Dental. Even out-of-network providers are reimbursed based on rates unilaterally determined by the insurer. In every scenario, patients are left to pay the difference between the provider's fee and the insurer's reimbursement. This makes Delta Dental the sole arbiter of what care is covered and at what cost.

Cherry Tree Dental operates 25 clinics across Wisconsin and maintains additional locations in neighboring states. By acquiring this multi-state, for-profit dental chain, Delta Dental now owns a network of clinics that directly competes with independent dental offices. This vertical integration creates a profound conflict of interest. Delta Dental will have both the incentive and the means to skew reimbursement rates in favor of its own clinics, effectively steering patients toward its facilities and away from independent providers.

In an apparent attempt to circumvent regulatory scrutiny, Delta Dental is now restructuring its corporate framework to make this acquisition appear legally permissible. But no matter how the ownership is disguised or restructured, the reality remains unchanged: Delta Dental will own Cherry Tree Dental. This ownership structure no matter how it is presented should not be allowed. It undermines the principles of fair competition and patient-first care.

This acquisition is contrary to the interests of insureds under Wis. Stat. s. 611.72 (a). It threatens transparency, erodes trust, and compromises the integrity of care decisions. Patients deserve an insurance system that prioritizes their health, not one that consolidates power to serve corporate interests.

It is time for the Office of the Commissioner of Insurance to act decisively. Reject this acquisition and protect the rights of insureds, the viability of independent dental practices, and the integrity of Wisconsin's healthcare system. Our patients are not commodities. They are

families, children, and seniors who are deserving of care driven by compassion, not corporate consolidation. Let us preserve a system where trust, fairness, and choice still matter.

Sincerely,
Christian Marsh, DDS
Winneconne, WI