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Office of the Commissioner of Insurance
101 E. Wilson St.
Madison, WI 53703

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

Dear Members of the OCI Committee,

My name is Dr. Ryan Clarence Dodge. I am a General Dentist in Hartford WI and I write, with conviction, in strong opposition to the proposed restructuring for Delta Dental of Wisconsin and Wyssta Insurance Company outlined in OCI Case No. 25-C46628 and No. 25-C46629. Many of my colleagues have submitted testimony urging OCI to consider whether the purchase of a dental practice is a proper use of Delta Dental of WI's premiums, and to examine the ethical implications, and potential conflicts of interest of the proposed restructuring. I echo the rationale submitted by my fellow dentists and ask OCI and the public to consider the following: The mission statement of the Office of the Commission of Insurance is "to protect and educate Wisconsin consumers by maintaining and promoting a strong insurance industry," and under section (3)(c) in the Case numbers listed above OCI is tasked with determining "whether the acquisition of control of Delta Dental of Wisconsin, Inc. and Wyssta Insurance Company, Inc. would create a monopoly or substantially lessen competition in insurance." For OCI to uphold its mission statement it must seriously consider the vast ramifications of approving Case No. 25-C46628 and No. 25-C46629.

The following three questions must be examined and answered: Will the proposed restructuring protect WI consumers? Are there financial implications of the restructuring in regards to Delta Dental of WI's ability to function as a Dental Insurance Company? Will the proposed restructuring constitute a monopoly and/or substantially lessen competition in insurance?

My twin brother Dr. Austin M. Dodge has also submitted testimony in which he elucidates the critical link between oral health and systemic health. This critical link has been proven to lengthen the life span, on average, by 7-10 years of those who maintain and prioritize their oral health by receiving regular dental care. On Delta's website they state that Delta provides dental benefit to over 2 million Wisconsinites. It is my understanding that the restructuring will eliminate the two positions on Delta Dental's Board of Directors currently held by dentists. While it is true the other board members understand the dental insurance industry it is undeniable that a unique perspective is gained by a practitioner delivering care to patients. By removing dentists from their board Delta quashes the voices that can advocate most effectively for the needs of the 2 million Wisconsinites under Delta's dental benefits. This lack of advocacy for patients by doctors in the decision-making body for Delta undeniably jeopardizes the health of those 2 million people, potentially leads to a loss of 14-20 million years of life for Wisconsinites, and a shortened lifespan, arguably, does not protect WI consumers.

Any practice owner in WI can tell you of the complexity of owning and operating a dental practice. The cost of delivering dental care comes with high overhead costs, potential risk of malpractice litigation, and is subject to the whims of an ever-changing economic landscape. That complexity and cost only increases when one considers owning and operating 28 practices (the current number of practices owned by Cherry Tree Dental in WI). If the operation of the 28 practices under Cherry Tree Dental is poorly managed, or in the event of an economic recession, money from the parent 1962 Holdings Inc. could need to be funneled through Wyssta Inc., Wyssta Care, Inc, and to Cherry Tree to keep operations afloat. Should Wyssta need to subsidize Cherry Tree long-term the assets of 1962 Holdings, Inc. could be jeopardized. If the assets of 1962 Holdings are compromised, the downstream assets of GreenCo Holdings, Inc. and Delta Dental of WI will also be jeopardized. If the assets of Delta Dental of WI are jeopardized there exists a very real possibility that Delta would be unable to properly pay claims on behalf of those they insure. This scenario once again does not protect WI consumers and demonstrates how the restructuring could fail to uphold Delta Dental of WI's quintessential purpose: to provide dental benefit for those they insure.

The definition of a monopoly is "exclusive control of a commodity or service in a particular market, or a control that makes possible the manipulation of prices." Delta Dental of WI's marketing campaigns state they are the current leader in the dental benefit market in WI. They insure over 2 million Wisconsinites and there are estimates that put 90% or more of current practicing dentists in their provider network. The proposed restructuring would put Delta and Cherry Tree under the same parent holding company— 1962 Holdings Inc. It is my understanding that there would be overlapping leadership present in the restructured organizational chart. If so, the restructuring acts only as a smokescreen, not an ironclad barrier. If decision makers on the board that sets the reimbursement rates for providing doctors, and decision makers on the board that sets the cost of providing care overlap there undeniably exists the possibility of manipulation of prices. If there is the possibility of manipulation of prices, by definition, there is the possibility of a monopoly. Furthermore, even if a true monopoly is not achieved I posit a substantial reduction in competition for insurance is possible. Imagine for a moment you are an executive on a dental benefit company and you are looking for a new state to expand your market. How likely are you to look to expand into a market where the entity with the highest market share has been given the power to control both the set cost of delivering dental care and the reimbursement rate towards that set cost? I argue, you are unlikely to consider WI for your expansion, and if you are unlikely to consider WI then we are not promoting a strong insurance industry. Our state's dental providers, dental patients, and oral health will subsequently suffer from the consequences of decreased competition in the insurance marketplace.

I thank you for your kind consideration of my testimony, and am grateful to be practicing and providing care for the great people of our state. Dentistry, in my opinion, is the greatest profession in the world, and I thank OCI for all they do to protect and serve the patients I faithfully serve each day in my practice. I can be reached at rdodge@wda.org or at (262) 673-6050.

Verba volant, scripta manent,

Ryan C. Dodge DDS

WDA Journal Editor