



Granville

HEALTH SYSTEM
Quality Care...Close To Home

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Oxford, NC 27565

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December 31, 2013

VIA EMAIL & FACSIMILE (919)715-4645

Mr. Craig Smith, Chief
North Carolina Department of Health and Human Services
Division of Health Services Regulation
RE: CON Request
Franklin Regional Medical Center

Granville Medical Center
919.690.3000

Brantwood Nursing
& Rehab Center
919.690.3334

South Granville Medical Center
919.528.7171

Granville Heart and Vascular
919.690.8853

Granville Surgical Associates
919.603.0368

Granville Specialty Clinics
919.690.3210

Harold Sherman Adult Day Ctr.
919.690.3273

Stovall Medical Center
919.690.8880

South Granville Primary Care
919.575.6103

Granville Urology Associates
919.690.0435

Granville Internal Medicine
& Geriatrics
919.693.6541

Emergency Medical Services
919.690.3000

Dear Mr. Smith:

Thank you for allowing me to make comments concerning the request made by Same Day Surgery Center Franklin ("SDSCF") and Novant Health, Inc. ("Novant") to move one existing operating room from Novant Health Franklin Regional Medical Center ("NHFRMC"), its current location in downtown Louisburg, North Carolina in central Franklin County, to Same Day Surgery Center Franklin ("SDSCF") located near the intersection of U.S. Highway 1 and N.C. Highway 96 approximately two miles northwest of Youngsville, Franklin County in close proximity to Wake County.

I am opposed to the Division of Health Service Regulation (the "Division") granting a Certificate of Need for the referenced project because it threatens the sustainability of Granville Health System's ("GHS") presence in Granville County. GHS has, in the recent past, made substantial expenditures to establish an urgent care health clinic in southern Granville County to serve an expanding population in that area. At the same time, GHS has continued to operate and make more than \$19,900,000.00 in improvements, including to its operating rooms, to its long established 62 acute care bed hospital in Oxford, Granville County, North Carolina.

GHS understands that moving this operating room would reduce NHFRMC's operating room capacity by 33% thereby jeopardizing the long-term viability of NHFRMC. GHS, like others in the community, is concerned that this is simply part of an ongoing strategy to close NHFRMC located in Louisburg in rural central Franklin County, and reopen the facility in the fast-growing and urbanizing area of Franklin County near Wake Forest and the Wake County line.

For the foregoing reasons, I respectfully request that NHFRMC's Certificate of Need request be denied.

Sincerely,

L. Lee Isley
Chief Executive Officer