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August 26, 2009

Dr. Sandra B. Greene., Chair Acute Care Services Committee c/o Medical Facilities Planning Section Division of Health Service Regulation 2714 Mail Service Center Raleigh, NC 27699-2714

RE: Comment on Petition from Affordable Health Care Facilities

Dear Doctor Greene:

Onslow Memorial Hospital (OMH) would like to take this opportunity to comment on the petition filed by Affordable Health Care Facilities (AHCF) to revise the Single Specialty Ambulatory Surgery Demonstration Project. In addition to the inflammatory language of the petition, OMH believes that the recommendation to open up the demonstration project to multiple other counties does not represent the best option for studying the effectiveness of single specialty ASC's. According to the suggested expansion of the demonstration project, Onslow County would qualify as a pilot demonstration county. As shown in the *Proposed 2010 SMFP*, Onslow County currently has a surplus of four operating rooms. As such, we do not believe expanding the demonstration project to include Onslow County would be prudent.

OMH believes the various committees and workgroups that have studied this demonstration project have conducted considerable due diligence, which is a better approach than opening up the demonstration to multiple other counties, particularly in areas like Onslow County, which, while not rural, could clearly be harmed by expanding the demonstration project as suggested in the petition. We hope that the Acute Care Services Committee and SHCC will maintain the Single Specialty Ambulatory Surgery Demonstration Project without expanding it to include numerous other counties, as proposed in the AHCF petition.

Sincerely,

Ed Piper, PhD

President and Chief Executive Officer