

**Novant Health and MedQuest Associates 8/15/2014 Comments on
Carolinas HealthCare System July 30, 2014 Public Hearing Comments
On the Draft 2015 State Medical Facilities Plan
Policy TE-1: Conversion of Fixed PET Scanners to Mobile PET Scanners**

Carolinas HealthCare System (“CHS”) states its overall support for Draft 2015 SMFP Policy TE-1 and the four conditions included in that policy. In addition, CHS suggests three more requirements or conditions. Novant Health and MedQuest offer their comments on these three additional conditions and the potential impact these requirements may have on the implementation of new mobile PET scanners.

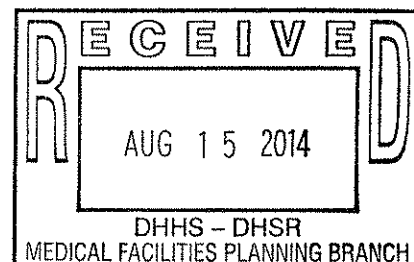
CHS Expresses Support for Policy TE-1 Condition #4 Prohibiting New Mobile PET Vendors From Serving Host Sites in the Nineteen North Carolina Counties With Existing Fixed PET/CT Scanners

SMFP Policy TE-1 Condition #4 as proposed in the 2015 SMFP has the unintended consequence of hampering the efforts of existing and developing health networks, often comprised of large, medium, and small hospitals located in urban and rural areas of North Carolina, to achieve cost savings by using their own mobile PET scanners to serve their own hospitals and facilities. We believe that the goal of increasing mobile PET access in rural areas and allowing health networks like Novant to serve their own hospitals and facilities are complementary goals that can successfully co-exist – they do not need to be mutually exclusive. One of the principles of the CON program is cost control. Providers are encouraged to look for ways to reduce cost whenever possible, and to make the most of their existing resources. That is exactly what Novant could do if allowed to convert an existing PET scanner to a mobile PET scanner.

Policy TE-1, Condition #4 creates an uneven playing field for new mobile PET market entrants, as the two existing Alliance Imaging mobile PET scanners would not be barred in the future from the serving the 19 counties where there are existing fixed PET scanners. In fact, today AI provides mobile PET services in counties where there are existing fixed PET scanners including Mecklenburg, Guilford, and Iredell counties.

Thus, Condition #4 of the proposed draft 2015 SMFP Policy TE-1 has the unintended consequence of giving the sole existing mobile PET vendor greater operational flexibility in the geographies that can be served than would be afforded to new mobile PET market entrants. This may unintentionally weaken the impact of competition and beneficial choice for providers seeking to contract for the first time for mobile PET services or add more mobile PET days of service. This handicaps new mobile PET providers and provides the existing mobile PET provider with advantages not available to other future mobile PET providers

The nineteen counties that have fixed PET/CT scanners in operation today are listed in the table below along with the county population.



Counties With Fixed PET Scanners Excluded For Access to New Mobile PET Units

| County | Projected 2015 County Population | Health Service Area |
|-------------------|----------------------------------|---------------------|
| Buncombe | 255,061 | I |
| Catawba | 155,630 | I |
| Forsyth | 365,734 | II |
| Guilford | 518,603 | II |
| Alamance | 154,869 | II |
| Mecklenburg | 1,032,096 | III |
| Union | 219,403 | III |
| Gaston | 212,423 | III |
| Cabarrus | 192,552 | III |
| Iredell | 169,133 | III |
| Durham | 296,679 | IV |
| Orange | 143,105 | IV |
| Wake | 1,055,322 | IV |
| New Hanover | 221,812 | V |
| Cumberland | 336,340 | V |
| Moore | 94,306 | V |
| Pitt | 176,885 | V |
| Craven | 104,566 | V |
| Nash | 94,134 | V |
| TOTAL-19 Counties | 5,748,662 | |
| North Carolina | 10,055,337 | |

Source: 2015 Draft SMFP and Office of State Management & Budget County Population Estimates for 2010-2019¹
OSMB County Population Table is attached to this comment.

The above table shows that almost 5.8 Million North Carolina residents of the above 19 counties would not have the option to have access to mobile PET services from any of the new mobile PET providers and would be left with Alliance Imaging as the only option. This represents 58% of North Carolina's population that is carved out of the geographies that can be served by new mobile PET providers that converted a fixed PET scanner to a mobile. The unintended consequence of the implementation of Policy TE-1 as drafted is that it creates a two-tier system where AI is able to serve all 100 North Carolina Counties and new mobile PET market entrants can only serve 81 North Carolina counties and the two most populous counties in North Carolina (Wake and Mecklenburg) are off limits to new mobile PET providers. Surely, this approach does not promote long overdue and beneficial competition and choice in mobile PET services.

¹NC Office of State Management and Budget County Population estimates for 2010-2019 were used in the above table. Specifically, the county population estimates for July 2015 were used, as CY 2015 would be the first year under the 2015 SMFP that providers could file a CON Application to seek the state's approval to convert their previously CON-approved fixed PET scanner to a new mobile PET scanner.

To ensure the beneficial impact of competition and related cost reduction opportunities, the language of Condition #4 should be adjusted to permit Novant Health and other new entrants to the mobile PET market to have the ability to serve their own hospitals and facilities². A provider seeking to convert a fixed unit of equipment to a mobile unit will only undertake this conversion if the regulatory structure and criteria encourages operational efficiency and financial feasibility and the ability to lower the cost of healthcare at its own facilities. This conversion policy offers a critical step in introducing competition in a closed market where one provider has controlled all mobile PET service availability for more than a decade.

In the 7/30/14 Novant Health and MedQuest comment/petition asked the SHCC to consider one recommended change to the language of condition #4 of SMFP Policy TE-1. It was an amendment of the language of Condition #4 which prohibits a new mobile PET provider from offering mobile PET services in counties with an existing fixed PET scanner. Novant Health and MedQuest would ask that committee members consider and support an addendum to Policy TE-1 Condition #4 that would allow a provider proposing to convert a fixed PET to a mobile PET the ability to serve its own related and affiliated entities in any county regardless of whether there is an existing fixed PET scanner in that county.

The language of Policy TE-1, Condition #4 could be supplemented as follows:

“...the converted mobile PET scanner...shall not serve any mobile host facility in a county where any existing or approved fixed PET scanner is located, except as required by subpart (1) above...*or except if the mobile PET host site is an owned, related, or affiliated entity of the mobile PET vendor or its parent organization.*”

CHS Recommends Including A Requirement That The Fixed PET Scanner Proposed for Conversion be Underutilized

As an initial matter, CHS does not define what is meant by “underutilized.” More specifically, the framework of the Policy TE-1 acknowledges that underutilized fixed PET capacity exists hence the conversion to a mobile unit in order to increase utilization. It is unnecessary to add an “underutilized” requirement to the policy. The language of Policy TE-1 as proposed in the draft 2015 SMFP seems to contemplate the inclusion of existing and approved fixed PET scanners as eligible for conversion to mobile PET. The first sentence of Policy TE-1 says: “*Facilities with an existing or approved fixed PET scanner may apply for a Certificate of Need (CON) to convert the existing or approved PET scanner to a mobile PET scanner...*” Novant Health and MedQuest support the language of the first sentence of Policy TE-1 as presented in the draft 2015 SMFP so that both existing and previously CON-approved fixed PET scanners would be eligible for conversion to a mobile PET scanner.

² For the SHCC’s consideration, Novant Health/MedQuest’s proposed language to supplement the existing language of Condition #4 of SMFP Policy TE-1 is discussed extensively in its July 30, 2014 comment/petition submitted to the DHSR Planning Section.

CHS Suggests A Limit of Two Fixed PET to Mobile PET Conversions in a Calendar Year

Novant Health and MedQuest concur with CHS's statement that "*there is a need for additional mobile PET capacity....*" In considering CHS's recommendation for "some limitation" placed on the annual number of fixed to mobile PET conversions, the SHCC and DHSR Planning staff may want to consider how a defined quantitative limit on annual new mobile PET scanners, somewhat analogous to an annual SMFP need determination, would interact with the provision of Policy TE-1 specifying that "*facilities with an existing or approved fixed PET scanner may apply for a Certificate of Need (CON) to convert the existing or approved PET scanner to a mobile PET scanner.*" As a practical matter such a limitation would specify the maximum new mobile PET scanners that could be approved annually. So hypothetically, if there were three CON applicants in one year for fixed to mobile PET conversions and the limit was two new mobile PET scanners per year, then only two of the three CON applications could be approved. It is important to remember that these applicants were previously approved to offer fixed PET services. It is unlikely that a multitude of providers will undertake a mobile PET conversion and those providers that are able to successfully do so should not be limited by a maximum number of approvals. This limitation increases the potential that the unsuccessful applicant would consider filing an appeal, which would delay the development of additional mobile PET scanners until such litigation is resolved and Certificates of Need for new mobile PET scanners could be issued by the state. CON litigation is both costly and time-consuming. Therefore, Novant and MedQuest do not support a maximum limit on the number of conversions that can be approved.

CHS Proposes the Establishment of a Single CON Application Filing Deadline Each Year to Promote the Competitive Review of Fixed to Mobile PET Conversion CON Applications

Novant and MedQuest do not support the encouragement of a competitive review for the conversion of fixed to mobile PET scanners. The applicants for a mobile PET conversion will be providers that have been previously approved by the Certificate of Need Section to offer fixed PET services. Considering this policy allows for conversion of existing resources and will not increase overall PET equipment inventory, there is no valid basis for the requirement of a competitive review when considering previously CON-approved equipment. There is no clear rationale to compare applications competitively when the potential applicants' service areas could vary dramatically. The moratorium on mobile PET capacity, which has lasted for well over a decade, has impacted patients in service areas across the State. The intent of Policy TE-1 is to improve accessibility and increase capacity for mobile PET services for residents of North Carolina as soon as possible.

ATTACHMENT A - POPULATION TABLES

Annual County Population Totals, 2010-2019

| County | Estimates | | | | | Projections | | | | |
|------------|-----------|---------|---------|---------|---------|-------------|---------|---------|---------|---------|
| | Jul-10 | Jul-11 | Jul-12 | Jul-13 | Jul-14 | Jul-15 | Jul-16 | Jul-17 | Jul-18 | Jul-19 |
| Alamance | 151,468 | 152,091 | 152,957 | 153,642 | 154,256 | 154,869 | 155,483 | 156,095 | 156,708 | 157,321 |
| Alexander | 37,245 | 37,534 | 37,391 | 37,448 | 37,429 | 37,410 | 37,393 | 37,378 | 37,364 | 37,352 |
| Alleghany | 11,148 | 11,077 | 11,000 | 11,029 | 11,033 | 11,040 | 11,048 | 11,053 | 11,060 | 11,066 |
| Anson | 26,875 | 25,820 | 26,626 | 26,322 | 26,429 | 26,429 | 26,427 | 26,430 | 26,427 | 26,428 |
| Ashe | 27,256 | 27,433 | 27,385 | 27,442 | 27,425 | 27,461 | 27,458 | 27,483 | 27,486 | 27,506 |
| Avery | 17,751 | 17,978 | 17,788 | 17,866 | 17,868 | 17,869 | 17,868 | 17,868 | 17,869 | 17,870 |
| Beaufort | 47,764 | 47,801 | 47,869 | 47,791 | 47,791 | 47,791 | 47,791 | 47,792 | 47,790 | 47,792 |
| Bertie | 21,200 | 20,996 | 20,676 | 20,586 | 20,581 | 20,599 | 20,618 | 20,518 | 20,393 | 20,247 |
| Bladen | 35,171 | 35,197 | 35,206 | 35,219 | 35,250 | 35,283 | 35,315 | 35,347 | 35,378 | 35,412 |
| Brunswick | 108,064 | 110,312 | 112,615 | 115,666 | 118,634 | 121,736 | 124,840 | 127,941 | 131,044 | 134,146 |
| Buncombe | 238,884 | 243,673 | 245,381 | 248,929 | 251,995 | 255,061 | 258,129 | 261,195 | 264,263 | 267,329 |
| Burke | 90,775 | 90,674 | 89,982 | 89,552 | 89,184 | 88,854 | 88,563 | 88,303 | 88,072 | 87,868 |
| Cabarrus | 178,517 | 180,846 | 183,465 | 186,502 | 189,528 | 192,552 | 195,578 | 198,602 | 201,629 | 204,654 |
| Caldwell | 82,947 | 82,913 | 82,582 | 82,536 | 82,405 | 82,313 | 82,231 | 82,155 | 82,089 | 82,029 |
| Camden | 9,983 | 10,065 | 10,014 | 10,040 | 10,092 | 10,135 | 10,179 | 10,221 | 10,264 | 10,307 |
| Carteret | 66,711 | 67,614 | 68,395 | 69,258 | 70,101 | 70,944 | 71,786 | 72,628 | 73,471 | 74,312 |
| Caswell | 23,665 | 23,910 | 23,591 | 23,736 | 23,708 | 23,720 | 23,715 | 23,717 | 23,718 | 23,718 |
| Catawba | 154,260 | 154,728 | 155,484 | 155,463 | 155,545 | 155,630 | 155,711 | 155,795 | 155,879 | 155,961 |
| Chatham | 63,751 | 65,630 | 66,478 | 67,638 | 68,770 | 69,901 | 71,035 | 72,167 | 73,298 | 74,432 |
| Cherokee | 27,438 | 27,541 | 27,406 | 27,156 | 27,060 | 27,061 | 27,059 | 27,061 | 27,060 | 27,061 |
| Chowan | 14,757 | 14,774 | 14,715 | 14,805 | 14,839 | 14,873 | 14,908 | 14,944 | 14,978 | 15,012 |
| Clay | 10,568 | 10,687 | 10,723 | 10,628 | 10,621 | 10,613 | 10,607 | 10,600 | 10,596 | 10,589 |
| Cleveland | 98,030 | 98,228 | 97,689 | 97,442 | 97,245 | 97,071 | 96,918 | 96,783 | 96,665 | 96,562 |
| Columbus | 57,918 | 58,009 | 58,037 | 57,536 | 57,376 | 57,378 | 57,377 | 57,377 | 57,379 | 57,377 |
| Craven | 104,138 | 104,685 | 105,203 | 104,435 | 104,288 | 104,566 | 105,552 | 107,074 | 108,914 | 110,755 |
| Cumberland | 327,445 | 330,548 | 330,215 | 332,595 | 334,466 | 336,340 | 338,213 | 340,086 | 341,957 | 343,830 |
| Currituck | 23,647 | 23,996 | 24,155 | 24,055 | 24,055 | 24,055 | 24,053 | 24,053 | 24,055 | 24,055 |
| Dare | 34,006 | 34,267 | 34,872 | 35,182 | 35,471 | 35,736 | 35,983 | 36,212 | 36,423 | 36,619 |
| Davidson | 162,874 | 163,559 | 163,273 | 163,826 | 164,110 | 164,485 | 164,828 | 165,181 | 165,532 | 165,884 |
| Davie | 41,312 | 41,385 | 41,378 | 41,524 | 41,647 | 41,771 | 41,895 | 42,018 | 42,140 | 42,264 |
| Duplin | 58,664 | 59,486 | 60,017 | 60,122 | 60,453 | 60,780 | 61,109 | 61,436 | 61,764 | 62,090 |
| Durham | 271,297 | 274,844 | 281,224 | 286,142 | 291,413 | 296,679 | 301,940 | 307,195 | 312,447 | 317,691 |
| Edgecombe | 56,604 | 56,090 | 56,062 | 55,723 | 55,735 | 55,509 | 55,456 | 55,277 | 55,192 | 55,035 |
| Forsyth | 351,380 | 353,949 | 357,593 | 360,589 | 363,211 | 365,734 | 368,157 | 370,489 | 372,731 | 374,887 |
| Franklin | 60,813 | 61,598 | 61,825 | 62,720 | 63,496 | 64,211 | 64,894 | 65,629 | 66,356 | 67,076 |
| Gaston | 206,139 | 207,262 | 208,484 | 209,606 | 210,980 | 212,423 | 213,867 | 215,314 | 216,758 | 218,204 |
| Gates | 12,168 | 12,170 | 12,114 | 11,654 | 11,263 | 11,021 | 10,874 | 10,782 | 10,728 | 10,695 |
| Graham | 8,870 | 8,917 | 8,850 | 8,845 | 8,979 | 9,038 | 9,103 | 9,168 | 9,232 | 9,297 |
| Granville | 57,578 | 58,231 | 58,004 | 57,925 | 58,042 | 58,128 | 58,216 | 58,302 | 58,389 | 58,473 |
| Greene | 21,225 | 21,569 | 21,358 | 21,081 | 21,059 | 21,058 | 21,058 | 21,059 | 21,059 | 21,058 |
| Guilford | 489,677 | 494,596 | 501,845 | 507,578 | 513,089 | 518,603 | 524,113 | 529,626 | 535,137 | 540,648 |
| Halifax | 54,559 | 54,444 | 54,223 | 53,718 | 53,432 | 53,115 | 52,793 | 52,475 | 52,155 | 51,835 |
| Harnett | 115,757 | 118,441 | 121,230 | 123,357 | 125,646 | 127,887 | 130,128 | 132,370 | 134,612 | 136,853 |

| | | | | | | | | | | |
|-------------|---------|---------|---------|---------|-----------|-----------|-----------|-----------|-----------|-----------|
| Haywood | 58,968 | 59,476 | 59,261 | 59,690 | 59,955 | 60,237 | 60,515 | 60,794 | 61,073 | 61,353 |
| Henderson | 106,951 | 108,041 | 108,069 | 109,305 | 110,264 | 111,197 | 112,110 | 113,003 | 113,873 | 114,721 |
| Herrford | 24,733 | 24,589 | 24,507 | 24,558 | 24,511 | 24,463 | 24,417 | 24,370 | 24,324 | 24,278 |
| Hoke | 47,579 | 49,154 | 50,031 | 50,678 | 51,434 | 52,289 | 53,290 | 54,428 | 55,684 | 57,016 |
| Hyde | 5,788 | 5,826 | 5,745 | 5,801 | 5,837 | 5,874 | 5,910 | 5,947 | 5,984 | 6,021 |
| Iredell | 159,766 | 161,211 | 162,967 | 165,025 | 167,078 | 169,133 | 171,189 | 173,245 | 175,303 | 177,359 |
| Jackson | 40,345 | 40,554 | 40,666 | 40,812 | 40,951 | 41,091 | 41,231 | 41,371 | 41,509 | 41,649 |
| Johnston | 169,633 | 172,606 | 174,686 | 177,372 | 180,064 | 182,756 | 185,448 | 188,140 | 190,831 | 193,525 |
| Jones | 10,081 | 10,550 | 10,615 | 10,554 | 10,579 | 10,601 | 10,627 | 10,652 | 10,677 | 10,701 |
| Lee | 57,859 | 58,127 | 59,039 | 59,356 | 60,314 | 60,982 | 62,030 | 62,866 | 63,831 | 64,590 |
| Lenoir | 59,408 | 59,361 | 59,383 | 59,063 | 59,016 | 58,966 | 58,918 | 58,870 | 58,821 | 58,773 |
| Lincoln | 78,406 | 78,874 | 79,204 | 79,768 | 80,329 | 80,889 | 81,452 | 82,013 | 82,573 | 83,136 |
| Macon | 33,928 | 34,213 | 33,974 | 34,149 | 34,133 | 34,160 | 34,184 | 34,207 | 34,231 | 34,249 |
| Madison | 20,773 | 21,151 | 21,206 | 21,370 | 21,440 | 21,514 | 21,588 | 21,659 | 21,730 | 21,802 |
| Martin | 24,463 | 24,163 | 23,982 | 23,755 | 23,608 | 23,458 | 23,306 | 23,157 | 23,009 | 22,859 |
| McDowell | 45,060 | 45,263 | 45,264 | 45,245 | 45,298 | 45,345 | 45,387 | 45,423 | 45,460 | 45,492 |
| Mecklenburg | 923,390 | 939,802 | 962,460 | 991,970 | 1,010,211 | 1,032,096 | 1,053,980 | 1,075,864 | 1,097,749 | 1,119,633 |
| Mitchell | 15,542 | 15,446 | 15,416 | 15,388 | 15,357 | 15,328 | 15,306 | 15,285 | 15,266 | 15,250 |
| Montgomery | 27,942 | 28,063 | 27,910 | 27,775 | 27,742 | 27,765 | 27,778 | 27,728 | 27,670 | 27,663 |
| Moore | 88,526 | 89,339 | 90,725 | 91,954 | 93,144 | 94,306 | 95,437 | 96,537 | 97,610 | 98,660 |
| Nash | 95,917 | 95,813 | 95,434 | 94,776 | 94,459 | 94,143 | 93,825 | 93,511 | 93,192 | 92,876 |
| New Hanover | 203,299 | 206,333 | 209,915 | 213,876 | 217,844 | 221,812 | 225,780 | 229,749 | 233,718 | 237,685 |
| Northampton | 22,022 | 21,931 | 21,539 | 21,218 | 20,958 | 20,691 | 20,432 | 20,166 | 19,904 | 19,640 |
| Onslow | 186,869 | 186,601 | 191,508 | 193,911 | 197,742 | 200,913 | 204,292 | 207,672 | 211,052 | 214,431 |
| Orange | 134,303 | 135,080 | 138,366 | 139,738 | 141,422 | 143,105 | 144,787 | 146,469 | 148,152 | 149,834 |
| Pamlico | 13,095 | 13,312 | 13,188 | 13,071 | 13,071 | 13,072 | 13,071 | 13,072 | 13,071 | 13,072 |
| Pasquotank | 40,644 | 40,322 | 40,131 | 39,298 | 38,919 | 38,667 | 38,498 | 38,386 | 38,313 | 38,263 |
| Pender | 52,384 | 53,473 | 54,368 | 55,587 | 56,589 | 57,728 | 58,789 | 59,890 | 60,975 | 62,060 |
| Perquimans | 13,482 | 13,540 | 13,679 | 13,735 | 13,823 | 13,946 | 14,104 | 14,294 | 14,496 | 14,701 |
| Person | 39,442 | 39,609 | 39,161 | 39,189 | 39,231 | 39,273 | 39,313 | 39,350 | 39,388 | 39,419 |
| Pitt | 168,787 | 169,840 | 172,529 | 173,938 | 175,446 | 176,885 | 178,322 | 179,759 | 181,197 | 182,634 |
| Polk | 20,442 | 20,533 | 20,312 | 20,528 | 20,603 | 20,679 | 20,753 | 20,822 | 20,888 | 20,951 |
| Randolph | 141,874 | 142,578 | 142,546 | 142,614 | 142,678 | 142,742 | 142,802 | 142,863 | 142,925 | 142,987 |
| Richmond | 46,635 | 46,465 | 46,183 | 46,053 | 46,030 | 46,001 | 45,976 | 45,947 | 45,922 | 45,893 |
| Robeson | 134,422 | 134,240 | 134,341 | 133,984 | 133,599 | 133,216 | 132,832 | 132,447 | 132,062 | 131,681 |
| Rockingham | 93,596 | 93,391 | 92,822 | 92,259 | 91,775 | 91,354 | 91,004 | 90,714 | 90,472 | 90,269 |
| Rowan | 138,379 | 138,294 | 138,141 | 138,708 | 139,161 | 139,617 | 140,072 | 140,528 | 140,981 | 141,438 |
| Rutherford | 67,763 | 68,238 | 67,956 | 67,764 | 67,535 | 67,315 | 67,121 | 66,948 | 66,798 | 66,664 |
| Sampson | 63,441 | 63,663 | 64,121 | 64,335 | 64,553 | 64,770 | 64,987 | 65,204 | 65,421 | 65,638 |
| Scotland | 36,097 | 36,291 | 36,358 | 36,231 | 36,120 | 35,970 | 35,836 | 35,696 | 35,559 | 35,420 |
| Stanly | 60,533 | 60,751 | 60,430 | 60,631 | 60,562 | 60,860 | 61,105 | 61,353 | 61,599 | 61,846 |
| Stokes | 47,352 | 47,480 | 47,035 | 46,747 | 46,409 | 46,097 | 45,809 | 45,547 | 45,307 | 45,086 |
| Surry | 73,682 | 73,450 | 73,676 | 73,367 | 73,368 | 73,368 | 73,369 | 73,368 | 73,367 | 73,369 |
| Swain | 13,997 | 14,220 | 14,466 | 14,596 | 14,750 | 14,904 | 15,058 | 15,211 | 15,367 | 15,522 |
| Tennessee | 33,061 | 33,247 | 33,000 | 33,222 | 33,231 | 33,337 | 33,530 | 33,768 | 34,035 | 34,313 |
| Tyrrell | 4,397 | 4,342 | 4,148 | 4,142 | 4,114 | 4,087 | 4,059 | 4,032 | 4,006 | 3,978 |
| Union | 202,164 | 205,337 | 207,835 | 211,558 | 215,416 | 219,403 | 223,439 | 227,564 | 231,746 | 235,994 |
| Vance | 45,358 | 45,434 | 45,455 | 45,070 | 44,977 | 44,888 | 44,811 | 44,751 | 44,701 | 44,659 |

| | | | | | | | | | | |
|-----------------------------|-----------|-----------|-----------|-----------|-----------|------------|------------|------------|------------|------------|
| Wake | 906,909 | 923,895 | 945,254 | 964,928 | 985,146 | 1,005,322 | 1,025,498 | 1,045,673 | 1,065,847 | 1,086,022 |
| Warren | 20,940 | 20,925 | 20,665 | 20,457 | 20,368 | 20,278 | 20,198 | 20,125 | 20,057 | 19,994 |
| Washington | 13,173 | 13,022 | 12,807 | 12,830 | 12,754 | 12,690 | 12,624 | 12,559 | 12,492 | 12,429 |
| Watauga | 51,009 | 52,111 | 52,480 | 52,692 | 52,959 | 53,224 | 53,490 | 53,757 | 54,021 | 54,287 |
| Wayne | 122,845 | 123,604 | 124,954 | 125,143 | 125,656 | 125,982 | 126,332 | 126,766 | 127,357 | 128,101 |
| Wilkes | 69,234 | 69,777 | 69,710 | 69,774 | 69,817 | 69,860 | 69,905 | 69,948 | 69,990 | 70,034 |
| Wilson | 81,302 | 81,370 | 81,706 | 81,419 | 82,175 | 83,085 | 84,550 | 85,865 | 86,990 | 87,604 |
| Yadkin | 38,401 | 38,400 | 38,235 | 38,146 | 38,023 | 37,913 | 37,815 | 37,724 | 37,640 | 37,566 |
| Yancey | 17,787 | 18,053 | 17,869 | 17,919 | 17,940 | 17,958 | 17,977 | 17,997 | 18,016 | 18,036 |
| STATE | 9,574,477 | 9,666,342 | 9,762,822 | 9,861,952 | 9,956,488 | 10,055,337 | 10,156,537 | 10,258,255 | 10,360,693 | 10,462,726 |
| TOTAL-19 FIXED PET COUNTIES | | | | | | 5,748,662 | | | | |

Return to Top

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