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March 9, 2021

To the North Carolina State Health Coordinating Council

Re: Petition Regarding Existing and Approved Specialized Breast MRI Scanners, Excluded from Planning Inventory, 2022 State Medical Facilities Plan

Wake Forest Baptist Imaging, LLC ("WFBI") hereby submits this letter in support of the March 3, 2021 Petition Regarding Existing and Approved Specialized Breast MRI Scanners, Excluded from Planning Inventory, submitted by Novant Health, Inc. and MedQuest Associates, Inc. (the "Breast MRI Scanner Petition").

WFBI understands that the Breast MRI Petition seeks to include the two specialized, fixed breast MRI Scanners found in Table 17E-2 of Chapter 17 of the 2021 State Medical Facilities Plan ("SMFP") in the fixed MRI Scanner inventory for planning purposes. One of the specialized breast MRI Scanners is owned by petitioner Novant who wishes to replace its existing breast MRI Scanner with a new, general purpose MRI Scanner (the "Replacement Scanner") that can be utilized to provide all types of MRI scans, not just breast scans, according to the Breast MRI Scanner Petition. Novant further represents that it intends to place the Replacement Scanner it hopes to acquire at Novant Health Imaging- Piedmont ("Piedmont") located in Winston-Salem, Forsyth County.

WFBI and its majority membership interest holders, North Carolina Baptist Hospital and Wake Forest University Health Sciences (collectively referred to as "Wake Forest Baptist Health" or "WFBH"), own and operate seven fixed MRI Scanners in Forsyth County and WFBI has been approved for one additional fixed MRI Scanner to be placed at WFBI - Kernersville, which project

is still under development. All eight of the WFBI and WFBH scanners are part of the fixed MRI inventory in the 2021 SMFP.

WFBI does not believe including this existing scanner in the fixed MRI Scanner inventory will negatively impact utilization of existing and approved equipment, including WFBI and WFBH's MRI equipment, or negatively impact future need determinations, competition or access for these services. Rather, including the breast MRI Scanner in the inventory will allow Novant to seek later approval to replace the machine and utilize it to serve a greater number of patients needing any type of MRI scan, thus providing enhanced access, choice and service to our community.

WFBI supports the Breast MRI Scanner Petition and encourages the SHCC to approve the Breast MRI Petition. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Dena B. Webb". The signature is fluid and cursive, with the first name "Dena" being the most prominent.

Dena B. Webb, MHA, RT(R)(M)(BS)
Administrator
Wake Forest Baptist Outpatient Imaging