the 10 percent reduction that Delta is requesting.

But on average – I have e-mailed the link to the study. On an average, the cost of living in Massachusetts overall is 39 percent higher than any other state in the U.S.

The grocery we are at 4 percent higher. Healthcare, 17 percent less. Housing is 110 percent higher.

Utilities we pay 13 percent higher than any other state. Transportation we pay 20 percent more, miscellaneous about 9 percent.

And how we obtained the cost of 17 percent, the average cost of healthcare are calculated using standard daily rate for a hospital room and the cost for a doctor's office visit and dental checkup updated on September 2018.

Thank you.

MS. FARRINGTON: Thank you. Is there anybody else?

MR. LUSTBADER: I'm David Lustbader, the immediate past president of the
Massachusetts Dental Society.

And I was basically charged through the DOI and through the legislative process with conducting talks with Delta on how we arrived where we did.

And I want to state unequivocally I think, you know, much of the testimony today is very compelling.

It is very emotional, and I don't disagree with what anybody said. It's very expensive to run a dental office.

I've been doing this for 30 years, and the reductions that are being talked about will affect all of us.

You know, I do want to say that the submission that, in the new amendments, nothing has substantially changed.

And we did have outside review of that, which we will submit to you, which from an actuarial standpoint thought it was reasonable.

I'm sure there are errors in there. I don't dispute Mr. Rosen's - he knows the data far better than everybody.
The assumptions made were at least reasonable and actuarial sound. What we also did have an outside independent review do is make an assumption of what would happen if Premier disappears.

And those numbers were truly frightening. You know, in the two years that we have been working with Delta, you know, that first six months of that process was them telling us that the Premier product would be gone.

It was getting harder to sell, and they had no way of looking forward that that was going to be a viable product.

So we just started asking the question how do we save it, and can it be saved. You know, this is what was derived.

I take them at their word that if this is denied and this - the DOI has given them permission to move from 176E to 175 with that product, that they can sell Total Choice, and I believe that they will move, you know, a substantial amount of their business to Total Choice.
MS. FARRINGTON: I want to correct something. The Division of Insurance approved a product.

MR. LUSTBADER: Correct.

MS. FARRINGTON: We do not approve moving any --

MR. LUSTBADER: I understand that.

MS. FARRINGTON: I want to make it absolutely clear --

MR. LUSTBADER: They have the legal means to move from 176E or 175 through that product.

I take them at their word that that will be their fallback position to, you know, move to more PPO products, which would result in, you know, by their admission a close to 30 percent rebasing, if you will.

Our objective at the MDS is to minimize the decreases, which nobody wants. And to maintain as much oversight from the DOI as possible through the 176E chapter.

It is our fear that as Delta moves their book of business to the 175, there will be technically still DOI oversight, but it's
not nearly as pronounced as it is now.

    We also want to correct some
people. You know, yes, there are guidelines in
the fee methodology, but they would still have
to come back every year to get approval from
the DOI, whether they wind up or down and have
to justify those increases or decreases.

    So they are not automatic, and
there are some other safeguards built in. But
I do want to say that we don't see any
substantial changes in the amendments that were
submitted, and we have had outside verification
of that.

    MS. FARRINGTON: Thank you.

    MR. LUSTBADEL: Thank you.

    MS. FARRINGTON: Anybody else
before - one last question, is there anybody
else here that wishes to make an oral statement
at this point?

    All right. Please come forward.

    MR. WALSH: Thank you, Ms.

    Farrington. And I also want to thank you and
the other members of the board for your
attention.