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March 26, 2021

Ms. Gloria Hale, Project Analyst
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RE: Written Comments Regarding CON Application by Open MRI and Imaging
of Asheville Projected ID # B-12032-21, FID # 960927

Dear Ms. Hale and Ms. Pittman:

I am writing on behalf of the physicians of EmmergeOrtho's Blue Ridge Division to express opposition to the Certificate of Need ("CON") application submitted by Open MRI and Imaging of Asheville ("Open MRI").

It is incorrect and unreasonable for Open MRI to base their future MRI utilization on historical volumes that include thousands of MRI referrals from our physicians. Neither EmmergeOrtho nor any of our physicians were asked by Open MRI to provide letters of support or MRI referral estimates for their CON application. We have no commitment to refer any specific numbers of imaging patients to their center.

Thank you for your consideration of this information.

Sincerely,

Michael Goebel, M.D.
President, Blue Ridge Division

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