



August 7, 2008

State Health Coordinating Council
c/o Ms. Carol G. Potter
Medical Facilities Planning Section
Division of Health Service Regulation
701 Barbour Drive
Raleigh, NC 27603

DFS Health Planning
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Medical Facilities
PLANNING SECTION

Dear Ms. Potter,

We are a healthcare provider in North Carolina and one of the many services we provide is comprehensive cancer care including radiation therapy with a linear accelerator. As such, we would like to express our strong opposition to an "adjusted needs determination" petition filed by Cary Urology for a dedicated prostate linear accelerator in Service Area 20.

While we are not in Service Area 20 (we are in Service Area 18), and therefore approval of this petition would not have a direct effect on us, we are very concerned about the precedent it would set which could potentially adversely affect all healthcare providers across the state. Service Area 20 is already well served by existing (underutilized) providers including providers associated with academic medical centers. Therefore, approval of this petition would be counter to several principles of the State Medical Facilities Plan. In the Radiation Oncology Services section, on page 102 it states "The high cost of establishing new programs and the possibilities for achieving further equipment and staff economies of scale are critical considerations in evaluating the need for new radiation oncology treatment center programs." Basic Principle 1. on page 2 of the SMFP is to "Promote Cost-Effective Approaches." Certainly adding another linear accelerator to an already underutilized Service Area is completely counter to these principles in the Plan.

We trust that you will consider the negative impact on existing providers and the bad precedent that would be set if this petition were to be approved and therefore recommend to the State Health Coordinating Council that the petition be denied.

Sincerely,

A handwritten signature in cursive script that reads "Reid Caldwell".

Reid Caldwell, Vice President
Organizational Quality & Ancillary Services