



.August 9, 2017

North Carolina Division of Health Services Regulation
Healthcare Planning
2704 Mail Service Center
Raleigh, North Carolina 27699-2714

Attn: NC State Health Coordinating Council

Dear Dr. Ullrich and Members of the Council:

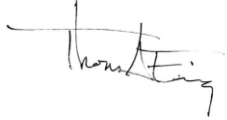
Alliance Healthcare Services is writing to provide a response to the written comment submitted by InSight Health Corp. regarding the need determination for a mobile PET scanner in the *2018 State Medical Facilities Plan (SMFP)*. It is unfortunate that the InSight commenter chose to provide disparaging allegations against Alliance Healthcare Services rather than offer coherent facts and analysis. Members of the State Health Coordinating Council and the public deserve truthful information as follows:

- Novant Health Forsyth Medical Center holds CON approval for one mobile PET scanner and Alliance HealthCare Services holds CON approval for two mobile PET scanners. Consequently, no monopoly for mobile PET exists in North Carolina.
- On multiple occasions Alliance Healthcare Services has correctly pointed out that many fixed PET scanners are severely underutilized and that additional mobile PET capacity could cause decreased volumes at some underutilized fixed PET hospitals.
- Over the past 15 years numerous hospitals have obtained CON approval for fixed PET scanners and Alliance Healthcare Services has provided extensive coordination of their mobile PET service to support these hospitals during their transition to fixed PET with no punitive actions.
- In 2017, Alliance Healthcare Services has already added five mobile PET host sites and adjusted the schedules of their mobile PET scanners to improve patient access and better serve host sites.
- Alliance Healthcare Services has extensive staff resources in North Carolina to educate patients and physicians and to support excellent quality of mobile PET service; InSight provides none of these services in North Carolina.
- The InSight accusations that Alliance Healthcare Services has access to detailed utilization data and has “the ability to take punitive action against host sites” are inflammatory and baseless.
- The commenter’s suggestions to add language to the 2018 SMFP to favor new provider applicants is unjustified because the mobile PET need determination is not a demonstration project.

Alliance HealthCare Services
1801 West End Avenue, Suite 700
Nashville, Tennessee 37203

The InSight comment does not warrant any response from the State Health Coordinating Council because it is unlike the many other comments and petitions that are timely, relevant and based on factual data.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Ewing". The signature is stylized with a long horizontal stroke at the beginning and a loop at the end.

Tom Ewing
Senior Vice President - Sales