

December 31, 2012

Centers for Medicare & Medicaid Services
ATTN: CMS-9972-P
U.S. Department of Health and Human Services
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Re: Comments on the Proposed Rule for Health Insurance Market Reforms

To Whom It May Concern:

I am writing on behalf of the Delta Dental Plans Association (“DDPA”) in response to the invitation for comments on the November 26, 2012, Proposed Rule for “Health Insurance Market Rules; Rate Review.” We are pleased to offer comments on the proposed rule specifically relating to “excepted benefits” and stand-alone dental benefits plans.

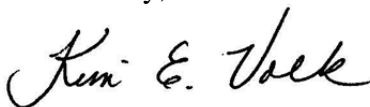
Scope and Applicability

Proposed section 144.102 (a) – (d) sets forth specific insurance markets and types of coverage that are subject to the “market reform” requirements set forth in the proposed rule. We recommend that a subsection “(e)” be added to this section on “scope and applicability” expressly stating that the requirements of these rules do not apply to “excepted benefits” coverage as defined in the Public Health Service Act at section 2791(c).

DDPA is the nation’s largest, most experienced dental benefits system. Since 1954, DDPA has worked to improve oral health in the U.S. by emphasizing preventive care, and making quality, cost-effective dental benefits affordable to a wide variety of large and small employers and groups. A nationwide system of dental health service plans, DDPA offers custom programs and reporting systems that provide employees with quality, cost-effective dental benefit programs and services. Our nationwide network of 39 companies and 142,000 dentists, serves more than 59.5 million Americans in over 97,900 group plans across the nation.

We very much appreciate the opportunity to submit comments on this important proposed rule. Please let me or my staff know if you have any questions.

Sincerely,



Kim E. Volk
President and CEO

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