



Christopher T. Roach

One Monument Square
Portland, ME 04101

207-791-1373 voice
207-791-1350 fax
croach@pierceatwood.com
pierceatwood.com

October 17, 2005

VIA HAND DELIVERY

Alessandro A. Iuppa, Superintendent
Attn: Vanessa J. Leon
Docket No. INS-05-700
Maine Bureau of Insurance
34 State House Station
Gardiner, Maine 04333-0034

In Re: Review of Aggregate Measurable Cost Savings Determined By Dirigo Health
For the First Assessment Year

Dear Superintendent Iuppa:

Enclosed for filing please find two hard copies of the following:

SUBMITTED BY: Christopher T. Roach
DATE: October 17, 2005
DOCUMENT TITLE: Anthem BCBS Request for Presentation of Panel
DOCUMENT TYPE: Response to Request for Information
CONFIDENTIAL: No

Thank you for your assistance in this matter.

Very truly yours,


Christopher T. Roach

cc: John Kelly
Thomas C. Sturtevant, Jr.

STATE OF MAINE
DEPARTMENT OF PROFESSIONAL AND FINANCIAL REGULATION
BUREAU OF INSURANCE

IN RE:)	
)	
REVIEW OF AGGREGATE)	
MEASURABLE COST SAVINGS)	ANTHEM HEALTH PLANS
DETERMINED BY DIRIGO HEALTH)	OF MAINE, INC.’s MOTION
FOR THE FIRST ASSESSMENT YEAR)	TO PERMIT WITNESSES TO
)	TESTIFY IN PANEL
)	FORMAT
)	
)	
)	
Docket No. INS-05-700)	

Anthem Health Plans of Maine, Inc. (“Anthem BCBS”) hereby requests that the Superintendent permit four of its witnesses to testify in a panel format. In support of this request, Anthem BCBS states as follows:

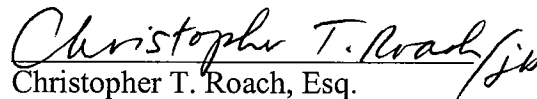
In his Second Procedural Order, the Superintendent established five different topics upon which he would take evidence and the order in which they should be presented (e.g., Hospital Savings Initiatives, Uninsured Savings Initiatives, Health Care Provider Fee Savings Initiatives, Certificate of Need and Capital Investment Fund Savings Initiatives, and Insurance Carrier Savings Initiatives.) The Superintendent also stated his preference for presentation of individual witnesses, rather than panels, as being more efficient.

Presentation of individual witnesses likely is more efficient if the witnesses are offered to speak on discrete issues, however, four of Anthem BDBS’s five witnesses (Sharon Roberts, Jack Keane, Daniel McCormack, and William Whitmore) will be presenting testimony that will be relevant to aspects of each of the identified topics for consideration by the Superintendent. Although each comes at the topics with different expertise, collectively they are able to provide

Anthem BCBS's views on each topic and it would be more efficient and cohesive for these witnesses to be presented once per topic as a panel, rather than having to call each witness individually. Presenting the witnesses in panel format will also make for far more efficient cross-examination. Rather than having to ask the same question of each individual witness for fear of getting an incomplete understanding of the Company's positions (which will necessarily prolong the proceeding), those examining the panel can ask their questions once and get Anthem BCBS's complete view on each topic.

The presentation of these four witnesses in a panel format will further the Superintendent's overarching goal "to secure the just, speedy, and economic determination of all matters pending before him in this proceeding and to prevent repetition or unreasonable delay in the proceeding." See Second Proc. Order ¶ 9, Ins. Rule Ch. 350(2)(B), 350(13)(C); 5 M.R.S.A. 9057(2). For these reasons, Anthem BCBS respectfully requests that the Superintendent issue an order permitting Sharon Roberts, Jack Keane, Daniel McCormack, and William Whitmore to testify as a panel on the issues in this proceeding.

DATED: October 17, 2005


Christopher T. Roach, Esq.

PIERCE ATWOOD LLP
One Monument Square
Portland, Maine 04101
(207) 791-1100

Attorney for Anthem BCBS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 17, 2005, a copy Anthem Health Plans of Maine, Inc.'s Request for Panel Presentation was served via electronic and US mail on each of the persons listed below:

Thomas C. Sturtevant, Jr.
Assistant Attorney General
Department of the Attorney General
6 State House Station
Augusta, Maine 04333-0006

Compass Health Analytics, Inc.
Attn: John Kelly
465 Congress Street, 7th Floor
Portland, Maine 04101

Roy T. Pierce, Esquire
PretiFlaherty
One City Center
P. O. Box 9546
Portland, ME 04112-9546

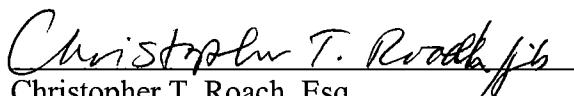
William H. Laubenstein, III, Esquire
Office of The Attorney General
6 State House Station
Augusta, Maine 04333-0006

William H. Stiles, Esquire
Verill Dana, LLP
One Portland Square
Portland, ME 04101

Rufus E. Brown, Esquire
Brown & Burke
85 Exchange Street, Suite 201
P.O. Box 7530
Portland, ME 04112

D. Michael Frink, Esquire
Curtis, Thaxter, Stevens, Broder
& Micoleau, LLC
One Canal Plaza
P.O. Box 7320
Portland, ME 04112-7320

DATED: October 17, 2005


Christopher T. Roach, Esq.

PIERCE ATWOOD LLP
One Monument Square
Portland, ME 04101
(207) 791-1100
Attorney for Anthem Health Plans of Maine, Inc.