September 14, 2018

Donna Jerry Senior Health Care Policy Analyst Green Mountain Care Board 144 State Street Montpelier, VT 05602

Re: Docket No. GMCB-010-15con, Green Mountain Surgery Center Notice of Nonmaterial Change

Dear Donna:

Pursuant to Green Mountain Care Board ("Board") Rule 4.600 and Condition 26 of the Certificate of Need granted July 10, 2017, ACTD LLC ("ACTD") hereby gives notice of nonmaterial changes in the Green Mountain Surgery Center ("Project"), namely, the addition of new physician owners, and services in ophthalmology and plastic surgery.

The Project was approved with nine owners, seven of whom plan to perform surgeries at the facility in five specialties (gastrointestinal, pain management, obstetrics and gynecology, orthopedics, and general surgery), and the anticipated future addition of new owners who might provide services in other specialties, including but not limited to oral surgery, podiatry, and plastic surgery. *See*, In re: ACTD LLC, d/b/a/ The Green Mountain Surgery Center, Statement of Decision (July 10, 2017) at Findings of Fact ¶¶ 2, 18, 20.

As planned, ACTD, LLC is now considering the addition of eight new physician owners who would perform surgeries at the facility in the following specialties – gastrointestinal, obstetrics and gynecology, orthopedics, ophthalmology, and plastic surgery. Each would purchase a minority interest in the company.

Thank you for your consideration.

Respectfully,

Amy Cooper Manager, ACTD LLC