

John P Bursell MD

3220 Hospital Dr. #101

Juneau, AK 99801

August 20, 2008

David Pierce

Certificate of Need Coordinator

PO Box 110610

Juneau, AK 99811-0610

Dear Mr. Pierce,

Thank-you for considering our request for determination of whether a certificate of need is required for our project. You have requested a certified estimate of the total cost of the proposed activity as well as details regarding square footage of the project and the building it will be housed in. Responses to these requests will be included in an attached document composed by our architect.

Your letter also shows concern about possible "phased activities to avoid the requirements of a certificate of need". For further clarification, our project is not part of a series of phased activities, rather it will be a stand-alone business entity. The project will be housed at 3200 Hospital Drive which is the building adjacent to the Juneau Bone and Joint Center. This project will be an entirely separate entity from the Juneau Bone and Joint Center.

Our proposed project is a Class B ambulatory surgery center which is designed specifically for interventional pain management procedures. This facility will not be designed in such a way that open or arthroscopic surgical procedures can be performed. Currently interventional pain management procedures are performed at Bartlett Regional Hospital in a hospital operating room. This type of procedure can be performed in a much more efficient and cost-effective manner in an outpatient facility. In addition, the Bartlett facility is unable to consistently accommodate the volume of procedures requested. A remodel of the Bartlett surgery area is planned for the near future. This planned remodel does not include any rooms to accommodate interventional spine procedures. In fact while meeting

with the Bartlett hospital administrator and members of the Bartlett Board of Directors we all agreed that it would be most appropriate to perform these procedures outside of the hospital. The completion of our project will simply allow us to perform interventional spine procedures for the Southeast Alaska Community in a setting that is the most efficient, safe, and cost-effective.

Sincerely,

John P Bursell MD