

May 13, 2024

Dr. Christian Zuver, MD  
Medical Director  
Orange County Emergency Medical Services  
4654 35<sup>th</sup> Street  
Orlando, FL 32811  
[Christian.zuver@ocfl.net](mailto:Christian.zuver@ocfl.net)

RE: Objection to Rightway BLS Services, Inc., Right by Your Side, and Florida Ambulance Service d/b/a Florida Medical Transport COPCN applications.

Dr, Zuver,

National Health Transport is responding to Orange County's notice of applicants and is filing an objection to the above-named applicants for Certificates of Public Convenience and Necessity.

National Health Transport petitioned this very Council just over two years ago meeting the requirements set forth by Orange County. At that time a need was proven, users of the system came forth and testified before the Board of County Commissioners that additional ambulance services were required to improve response times.

Subsequently, four new Certificates have been issued. National Health Transport, Affordable, First to Aid (now Trident), and Air Methods have all added capacity to the non-emergency ambulance transport system in Orange County.

As noted by the lack of response to the recent system survey, the hospital systems, nursing homes, and other healthcare institutions of the system are happy with the improvements that have been made since the addition of the latest providers. Further diluting the system will be detrimental to those who have made the most recent investments. Additionally, no need for additional services has been suggested or proven by any of the current applicants.

Systems around the country known for an open-door approach to EMS are fraught with challenges in monitoring quality and are more prone to instances of fraud and abuse<sup>1</sup>.

National Health Transport operates in 11 Florida Counties. Orange County, by far, has the most providers per capita than any other county in which we operate. Because of that, the cost of doing business is higher as well. The system has reached capacity in terms of providers. Allow us to continue providing excellent services and deny Rightway BLS Services, Inc., Right by Your Side, and Florida Ambulance Service d/b/a Florida Medical Transport COPCN applications.

Sincerely,

Raul Rodriguez, CEO



A handwritten signature in black ink, appearing to read 'R. Rodriguez', is written over a horizontal line.

<sup>1</sup> CMS enrollment moratorium in eight Texas counties.