

May 13, 2024

via FedEx and Electronic Mail

Dr. Christian C. Zuver
Christian.Zuver@ocfl.net
Orange County Emergency Medical Services
4654 35th Street
Orlando, FL 32811

Re: Objection to Application of The Nemours Foundation d/b/a
Nemours Children's Hospital, Florida for COPCN
MLG File No. 122031

Dear Dr. Zuver:

Our firm represents Lifefleet Southeast, Inc., d/b/a American Medical Response ("AMR") as an existing holder of a Certificate of Public Convenience and Necessity ("COPCN") to operate Advanced Life Support ("ALS") and Basic Life Support ("BLS") interfacility services in Orange County. Pursuant to Section 20-94(b) of the Orange County Code of Ordinances, AMR hereby files this objection (the "Objection") to the Application of The Nemours Foundation d/b/a Nemours Children's Hospital, Florida ("Nemours") for a COPCN to operate ALS/BLS interfacility service within Orange County. This Objection is timely because it has been served within 14 days of the County's notice of the Application.

Grounds for Objection

As you are aware, the County Code was recently amended to set certain requirements applicants must meet to prove a need for additional transportation services in the County before a COPCN will be issued. In particular, for interfacility transportation applicants, the Code now requires that an applicant include, "[a]business agreement between the applicant and a health care facility or governmental entity located in Orange County, Florida for the provision of ALS or BLS services, which may include interfacility transport." See Code Section 20-93(d)(6).

Here, Nemours fails to include any business agreement with a health care facility or government entity in Orange County even though it is applying for an interfacility COPCN for ALS/BLS services. As you'll recall the inclusion of this requirement for a business agreement for an applicant to be considered for an interfacility COPCN was one of the specific amendments to the County Code recently implemented. If Nemours is granted an interfacility COPCN without an agreement, such decision would patently violate this new Code provision.

For this reason, American Medical Response, as an existing provider of ALS/BLS interfacility service in Orange County, respectfully requests that the Application of The Nemours Foundation d/b/a Nemours Children's Hospital, Florida., be denied.

Should you have any questions, please do not hesitate to contact me at (813) 923-1502.

Best regards,

MILLS LAW GROUP PA

Jordan Miller

Jordan Miller

SJM/cls

cc: (via email)