THE STATE OF NEW HAMPSHIRE

INSURANCE DEPARTMENT

In re Petition of Frisbie Memorial Hospital et al.

INS No. 13-038-AR

AFFIDAVIT OF ROBERT BENEDETTO
IN SUPPORT OF SECOND SUPPLEMENTAL BRIEF OF
ANTHEM BLUE CROSS AND BLUE SHIELD RE: AGGRIEVEMENT

I, Robert Benedetto, being duly sworn, depose and say:

1. I am over the age of 18 years and believe in the obligation of an oath.

2. I am Director of Sales for Anthem Blue Cross And Blue Shield ("Anthem").

3. I am submitting this Affidavit in further support of Anthem's position that the Petitioners do not have standing, as set forth in all of Anthem's Prior Submissions and in particular, in its Second Supplemental Brief being submitted to the Department.

4. Petitioner Margaret A. McCarthy of 30 Cocheco Avenue, Rochester, New Hampshire 03868 is a covered member under an Anthem Lumenos HSA Plan (Contract No. YGD0456M20167), which Plan became effective August 1, 2011 ("Health Coverage").

5. Petitioner McCarthy's Health Coverage has remained in effect up to the present and it has a renewal date of August 1, 2014.

6. There have been no changes in Petitioner McCarthy's Health Coverage since before April 10, 2013, the date of the Department's Bulletin (Docket No. INS 13-007-AB),

and Ms. McCarthy continues to be covered for health care services received at Petitioner Frisbie and its affiliated providers under the terms of her Health Coverage.

7. As of February 28, 2014, more than 16,000 individuals have enrolled in Anthem Qualified Health Plans served by the Pathway Network on the New Hampshire Exchange.

Dated at Manchester, New Hampshire this 11th day of March, 2014.

ROBERT BENEDETTO
Director of Sales
Anthem Blue Cross And Blue Shield

STATE OF NEW HAMPSHIRE)
) ss.
COUNTY OF HILLSBOROUGH)

Subscribed and sworn to before me this 11th day of March, 2014.

~~Commissioner of Superior Court~~
Notary Public

SARA A. WAGNER, Notary Public
My Commission Expires April 17, 2018