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December 15, 2006

Bill Long
MultiMed Billing Service, Inc.
PO Box 535
Baldwinsville, NY 13027

Re: NAVAC/NOVA

Dear Bill:

Please be advised that this firm represents Northern Onondaga Volunteer Ambulance, Inc. ("NOVA"). We are writing to you in reference to North Area Volunteer Ambulance Corps, Inc. ("NAVAC"). We have been told that you might already be aware of this situation.

As you may know, NOVA and NAVAC are involved in a controversy regarding a portion of the response area in which NAVAC is providing services but holds no CON granting it the necessary authority to do so. NAVAC contends that it is entitled to "grandfathering" on the basis of having served this area continuously since prior to April 1, 1975. As you also may know, the Department of Health has written two letters (attached) essentially inviting NAVAC to submit documentation to substantiate its claim for grandfathering and indicating that DOH will not take any action against NAVAC for operating in these areas while this matter is pending.

NOVA disagrees with DOH's contentions in two key respects: (1) that DOH has the statutory authority to entertain a request for grandfathering from NAVAC; and (2) that DOH has the discretion to disregard a known violation of Article 30 while this matter is "pending." Attached, please find a letter we have sent to DOH on behalf of NOVA explaining our contentions.

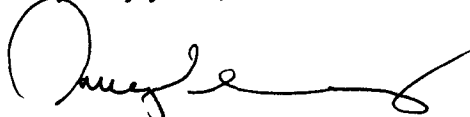
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The reason we are writing to you is because we understand that you bill for NAVAC (and for NOVA). Bill, we hope you know that we would never seek to put you or MultiMed in the middle of a dispute between two neighboring ambulance services, particularly when they are both your clients. However, we are convinced that NOVA is correct under the law, and that NAVAC clearly lacks the legal authority to serve the areas for which it is presently uncertificated. We hope to convince the Department of Health of this position. In the meantime, we hold the view that NAVAC is not permitted, as a matter of law, to bill or receive a fee for services that it has no legal right or authority to provide in the first place. Where claims are sent to Medicare or other state or federal payors, we believe that NAVAC would be operating outside both the applicable Medicare regulations and the certifications made on its 855 provider enrollment form by billing for services for which it lacks the necessary legal approvals to provide. Further, this could well constitute a violation by NAVAC of the 1500 certification that is included or implied on every individual claim form submitted on the provider's behalf.

Again, we are not presuming to compromise a client relationship for MultiMed or tell it how it should handle this matter. We have been asked to review the legal issues surrounding the NOVA/NAVAC dispute, and we believe that NAVAC is operating unlawfully in the areas where it lacks a CON. If it is operating unlawfully, we believe NAVAC should not be billing Medicare or other payors for its services rendered in those areas. We do not want to see MultiMed compromised in any way if this NOVA/NAVAC dispute does indeed spill over into Medicare issues, which may result in a substantial overpayment for NAVAC.

Please give us a call if you would like to discuss this matter in more detail.

Very truly yours,



Douglas M. Wolfberg
for PAGE, WOLFBERG & WIRTH, LLC

DMW:

cc: Northern Onondaga Volunteer Ambulance, Inc.