

COVINGTON

BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
JOHANNESBURG LONDON LOS ANGELES NEW YORK
PALO ALTO SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

Michael L. Rosenthal

Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 5448
mrosenthal@cov.com

ENTERED
Office of Chief Counsel
September 8, 2025
Part of
Public Record

BY E-FILING

September 8, 2025

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: Docket No. FD 36873, *Union Pacific Corp., et al. - Control - Norfolk Southern Corp., et al.*

Dear Chief of Case Administration:

Union Pacific Corporation and Union Pacific Railroad Company (collectively, Union Pacific) write in response to the Board's decision served August 25, 2025, in the referenced matter directing Union Pacific to make available its 100% traffic tapes for the period January 1, 2019, through December 31, 2024. Due to the size of these materials, the traffic tapes are being submitted to the Board via Kiteworks (Covington's secure FTP site). Pursuant to footnote 5 of the Board's decision, Union Pacific's submission also includes an accompanying data dictionary file. The traffic tapes should be treated as Highly Confidential, as that term is defined in the Protective Order served August 5, 2025.

Sincerely,

/s/ Michael L. Rosenthal

Michael L. Rosenthal

*Attorney for Union Pacific
Corporation and Union
Pacific Railroad Company*

cc: All Parties of Record