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ENTERED
Office of Chief Counsel
September 26, 2025
Part of
Public Record

September 26, 2025

CSXT-25

VIA E-FILING

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

**Re: STB Docket No. FD 36836, Norfolk Southern Corporation & Norfolk
Southern Railway Company—Acquisition of Control—Norfolk &
Portsmouth Belt Line Railroad Company**

Dear Chief of Case Administration:

On August 26, 2025, CSX Transportation, Inc. (“CSXT”) filed eight letters from various parties in regard to the application filed by Norfolk Southern Corporation and Norfolk Southern Railway Company in the above-referenced proceeding. Subsequently, CSXT determined that its August 26, 2025 filing inadvertently omitted a letter from Randy Wright, Norfolk City Council, Ward 5. Mr. Wright’s letter is enclosed for e-filing.

Please contact me with any questions.

Respectfully submitted,

/s/ Peter W. Denton

Peter W. Denton

Attorney for CSX Transportation, Inc.

Enclosures

August 13, 2025

Cynthia T. Brown
Chief of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: STB Docket No. FD 36836 - Urge Denial of Norfolk Southern's Application and Support
Competitive Rail Access at Norfolk International Terminals

Dear Ms. Brown:

I write to you today as a former Norfolk City Councilman representing Ward 5, including the Ocean View and East Norfolk communities, and as someone who has spent a lifetime advocating for neighborhood accountability and transportation equity. I respectfully urge the Board to deny Norfolk Southern's application to gain full control of the Norfolk & Portsmouth Belt Line Railroad (NPBL), because doing so would entrench monopoly power and harm public interests at the Port of Virginia.

1. Citizens Deserve Choice, Not Monopoly Control

Throughout my decades in civic life, I've opposed centralized control that sidelines community voice, whether with tax increases or excluded neighborhoods. Norfolk Southern's current dominance over NPBL has effectively prevented CSX from providing direct rail service to Norfolk International Terminals (NIT), forcing reliance on trucking for CSX-bound cargo. That arrangement eliminates competition, hits local businesses with higher freight rates, and denies Norfolk residents access to rail-based economic benefits.

2. Neighborhood Impacts and Public Safety Concerns

In my time on City Council, especially in transportation committees, safety has always been front and center. Right now, an estimated 100-150 daily container truck moves are routed between NIT and the Virginia International Gateway (VIG) in Portsmouth, crossing Hampton Boulevard, a busy corridor that runs through residential zones and adjacent to Old Dominion University. These trucks traverse sidewalks and bike paths used by children on their way to school and university staff, compounding accident risk with unnecessary traffic volumes.

Allowing CSX on-dock access to NIT would dramatically reduce these truck trips, shifting freight to rail, the safer alternative. That transition is consistent with the safe, transit-forward vision I fought to bring to Norfolk, including support for light rail and transit-oriented development, which I championed as chair of the Hampton Roads Transit's New Starts Committee.

3. Accountability for Public Investment

Virginia has invested over \$1.4 billion to expand and modernize NIT. It is only fair that this taxpayer-funded facility serves the entire rail industry, not just one dominant operator. By blocking CSX, NS effectively undermines the return on that public investment, limiting capacity, cargo throughput, and economic opportunity. I've pushed before for public infrastructure to benefit the whole community, not serve as a tollgate for private monopoly interests.

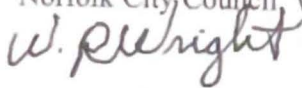
4. Rail Competition Benefits Every Norfolk Resident

I have never shied away from fighting entrenched interests. My stance today remains the same: When no single company has unilateral control over critical assets like NPBL, it forces accountability, better rates, and improved service. Monopolistic control has the opposite effect.

For small businesses, that competition means lower logistics costs, and by extension, lower prices and more reliable jobs. For neighborhoods, it means less heavy truck traffic, fewer emissions, and safer streets. For taxpayers, it means public assets delivering on their promise.

In sum: I urge the Surface Transportation Board to deny Norfolk Southern's application, open the terminal to fair competition, and allow CSX to provide on-dock rail service. The people of Norfolk, and the public interest, deserve nothing less.

Sincerely,
Randy Wright
Norfolk City Council, Ward 5



CERTIFICATE OF SERVICE

I hereby certify that I have caused this Letter in Docket No. FD 36836 to be served electronically or by first class mail, postage pre-paid, on the Secretary of Transportation, the Attorney General of the United States, Administrative Law Judge Jenifer Soulikias, Applicants' representative, William Mullins, and all parties of record in this proceeding.

/s/ Jensen Matsuda

Jensen Matsuda

Attorney for CSX Transportation, Inc.

September 26, 2025