

ENTERED
Office of Chief Counsel
September 30, 2025
Part of
Public Record

Dear STB Board Members:

I am writing in **opposition** to the UP-NS merger (FD 36873).

How my industry will be impacted by the UP/NS mega-merger: This merger will grant UP unfair market dominance by controlling 45% of all rail freight and more than 50% for many individual commodities. For many shippers this mega-merger will reduce options from multiple resources to now be only one option of UPNS. I have concerns this mega-merger will reduce railroad employment across the USA and we saw in covid-19 having too few employees is a huge risk to industry. UPNS claims they will grow volume, but prior mergers resulted in less volume. UPNS claims they will help the industry, but past examples show it increased costs and USA is already suffering from high inflation over the recent years. UPNS claims this will improve operations, but past examples show integration creates delays and cost.

In conclusion, UPNS is not good for the industry because it reduces options and presents greater risk. I request the STB please **deny** this mega-merger.

Thank you.

Kerpatrick Lewis

CC: Parties of Record