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Office of Chief Counsel
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CSXT-26

October 27, 2025

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 September 18, 2025, CSX Transportation, Inc. (“CSXT”) filed its Evidence and Argument in Opposition to the NS Control Application (“Opposition”) in the above-referenced proceeding. CSXT filed a corrected version of the Opposition on September 23, 2025.

CSXT respectfully submits this Errata correcting certain errors in the Verified Statement of Julie M. Carey (Attachment 3 to the Opposition). Enclosed is a highly confidential version of the Errata to be filed under seal, and a public version with appropriate redactions that the Board can place in its docket.

Please contact me with any questions.

Respectfully submitted,

/s/ Peter W. Denton

Peter W. Denton

Attorney for CSX Transportation, Inc.

Enclosures

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

**DOCKET NO. FD 36836
NORFOLK SOUTHERN CORPORATION
NORFOLK SOUTHERN RAILWAY COMPANY
—ACQUISITION OF CONTROL—
NORFOLK & PORTSMOUTH BELT LINE RAILROAD COMPANY**

CSX TRANSPORTATION, INC.

**ERRATA TO VERIFIED STATEMENT OF JULIE M. CAREY
NATIONAL ECONOMIC RESEARCH ASSOCIATES, INC.
(NERA)**

OCTOBER 27, 2025

Page/FN	Current Language	Corrected Language w/ Highlighted Correction
Page 9	With expansion, NIT will have 19 super Most Panamax ship-to-shore cranes and 96 semi-automated stacking cranes that will enable efficient container ship loading and unloading at NIT at a higher rate than at VIG.	With expansion, NIT will have 19 Super Post Panamax ship-to-shore cranes and 96 semi-automated stacking cranes that will enable efficient container ship loading and unloading at NIT at a higher rate than at VIG.
Page 9, FN 33	Port of Virginia, “Capabilities,” available at https://www.portofvirginia.com/gateway/capabilities/ .	Port of Virginia, “Capabilities,” available at https://www.portofvirginia.com/gateway/capabilities/ . See also Port of Virginia, “Norfolk International Terminals (NIT),” available at https://www.portofvirginia.com/wp-content/uploads/2024/03/2024-NIT-1-Pager.pdf
Page 9, FN 36	See Port of Virginia, “Capabilities” and Port of Virginia, “Norfolk International Terminals (NIT).”	See Port of Virginia, “Capabilities”, available at https://www.portofvirginia.com/gateway/capabilities/ . See also Port of Virginia, “Norfolk International Terminals (NIT),” available at https://www.portofvirginia.com/wp-content/uploads/2025/03/POV_2025-NIT-2.pdf/ .
Page 9, FN 37	Port of Virginia, “Virginia International Gateway (VIG),” available a https://www.portofvirginia.com/wp-content/uploads/2024/03/2024-VIG-1-Pager.pdf .	Port of Virginia, “Virginia International Gateway (VIG),” available a https://www.portofvirginia.com/wp-content/uploads/2024/03/2024-VIG-1-Pager.pdf . See also Port of Virginia, “Norfolk International Terminals (NIT),” available at https://www.portofvirginia.com/wp-content/uploads/2025/03/POV_2025-NIT-2.pdf/ .
Page 11, FN 45	See Port of Virginia, “Capabilities,” available at https://www.portofvirginia.com/wp-content/uploads/2025/03/POV_2025-NIT-2.pdf/ .	See Port of Virginia, “ Norfolk International Terminals ” available at https://www.portofvirginia.com/wp-content/uploads/2025/03/POV_2025-NIT-2.pdf/ .
Page 13, FN 53	For the broader market area, Mr. Fapp argues that CSXT and NS compete on {{[REDACTED]}} of the corridors. As shown in Figure 4 below, CSXT only has {{[REDACTED]}} share on collective POV corridors.	For the broader market area, Mr. Fapp argues that CSXT and NS compete on {{[REDACTED]}} of the corridors. As shown in Fapp Exhibit DLF-4 , CSXT only has {{[REDACTED]}} share on collective POV corridors.
Page 18, FN 95	See NS-1, McCellan V.S., p. 14.	See NS-1, McClellan V.S., p. 14.
Page 27, FN 135	See NIT Schedule of Rates No. 1, Effective 10-1-2024.pdf, pp. 36, 44.	See VIT Schedule of Rates No. 1, Effective 10-1-2024.pdf, pp. 36, 44.
Page 29, FN 142	See Appendix B - Exclusionary Conduct for a discussion of the assumptions in the analysis.	See Carey HC-WP Switch Rate Move by Move for a discussion of the assumptions in the analysis.
Page 30, FN 147	Section V.D below	Section V and Section VI. C below
Page 32, FN 162	CSXT Letter To NPBL dated May 1, 2025. See Kenney VS, Attach. H., filed Sept 18, 2025.	CSXT Letter To NPBL dated May 1, 2025. See Kenney VS, p. 13-14 and Attach. H., filed Sept 18, 2025.

Page 33, FN 168	NS-13 Fapp VS, p. 12.	NS-13 Fapp VS, p. 12. See also CSXT-22 Kenney VS, p. 12
Page 37	Looking at it another way, if NS and NPBL both serve NIT now and NIT gains control of NPBL, one railway will serve NIT.	Looking at it another way, if NS and NPBL both serve NIT now and NS gains control of NPBL, one railway will serve NIT.
Page 40, FN 206	See Keeny VS, p. 7.	See Kenney VS, p. 7.
Page 41, FN 215	Fapp June VS, p. 32. The NS Application references section nine of the NPBL Agreement, July 7, 1897, p. 4, NSR_00104139.	Fapp June VS, p. 32. The NS Application references section nine of the NPBL Agreement, July 7, 1897, p. 4, NSR_00104139. See also NS-1, McClellan VS, p. 21 and Fapp VS, p. 16.
Page 42, FN 218	Mr. Fapp acknowledges in his deposition that charging distinct prices for distinct products can be procompetitive See Deposition of Daniel L. Fapp, Wednesday August 13, 2025, p. 75.	Mr. Fapp acknowledges in his deposition that charging distinct prices for distinct products can be procompetitive. See Deposition of Daniel L. Fapp, Wednesday August 13, 2025, p. 75.
Page 46, FN 245	See Fapp_000890, _Fapp_000966 at Fapp_000965, and Fapp_000966.	See Fapp_000890-Fapp_000966 at Fapp_000965, and Fapp_000966.
Page 50, FN 272	Carey HC-WP-NPBL Fixed Cost. This illustration assumes and is based on Mr. Fapp's calculations.	Carey HC-WP-NPBL Fixed Cost. This illustration assumes the restated fixed cost from Section VI.A below and is based on Mr. Fapp's calculations.
Page 55, FN 306	It is also similar to NS' overall maintenance expense rate per car mile reported in its R-1. See Email Re Rail Service Connection to NIT - Rate Proposal and Operating/Financial Plan, July 19, 2010, Table 2.	It is also similar to NS' overall maintenance expense rate per car mile reported in its R-1. EDVA Antitrust Litigation, Exhibit 105, CSXT0100336-42, 2010 proposal.

VERIFICATION

I, Julie M. Carey, declare under penalty of perjury that I have read the foregoing Errata, that I know the facts asserted therein, and that the same are true as stated. Further, I certify that I am qualified and authorized to submit this Errata.

Executed on October 27, 2025

Julie M. Carey

CERTIFICATE OF SERVICE

I hereby certify that I have caused this Errata 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.

October 27, 2025