

October 25, 2025

ENTERED
Office of Chief Counsel
November 13, 2025
Part of
Public Record

Surface Transportation Board
Office of the Chief Counsel
395 E Street SW
Washington, DC 20423

Re: Proposed UP-NS Merger, Docket No. FD 36873

Dear Office of Chief Counsel,

My name is Kelly Reese, and I'm the founder of a small business here in Alabama. Like so many small business owners, I've learned that success depends on having a supply chain we can actually count on — and that means reliable, affordable rail service.

Recently, I saw that Union Pacific and Norfolk Southern are planning to merge. On paper, it might sound like progress, but for small businesses like mine, I've seen how these big mergers usually play out — and it's rarely in our favor.

As an entrepreneur, I've built my business from the ground up with a lot of hard work, determination, and not a lot of extra cushion. When large corporations merge and competition disappear, it's small, independent businesses — especially those that are minority- or women-owned — that end up paying the price. Shipping delays, higher costs, and less reliable service hit us directly, while big companies can usually absorb the impact.

If this merger goes through, Union Pacific and Norfolk Southern would control most of the rail market, basically creating a duopoly. And when competition fades, costs go up — not just for businesses, but for everyday consumers and working families too. That's not fair, and it's not healthy for our communities.

To me, real competition isn't just about dollars — it's about opportunity. It's about making sure every business, no matter its size, has a fair shot to grow and thrive. Alabama's economy depends on keeping goods moving efficiently, prices stable, and opportunities open to everyone.

I hope the Surface Transportation Board will take a close look at how this merger could hurt small and minority-owned businesses like mine, and make sure any decision protects competition, reliability, and fairness.

Thank you for listening to the voices of small business owners who are working hard every day to keep our communities strong.

Sincerely,

A handwritten signature in cursive script that reads "Kelly Reese".

Kelly Reese

Inside Medicine

Cc: Parties of Record, Small Business Administration, and
United States Department of Justice