

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

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

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

Dear Office of Chief Counsel,

My family has been farming ranching in Texas for generations. We rely heavily on freight rail to move essential goods to bring our crops or livestock to market and ensure we can compete globally.

When rail service falters—whether through higher rates, reduced options, or poorly executed mergers—it creates ripple effects across the entire supply chain. These changes can be the difference between a profitable season or closing the doors on a farm that has sustained the community for generations.

Recently two of the largest railroads in the United States, Union Pacific and Norfolk Southern, announced their intent to merge. I am concerned about the impact this merger will have on competition. The freight rail industry is already dominated by a small number of players. If this merger is approved, the two companies would create a near duopoly, further reducing competition and leaving farmers with fewer options and higher costs at a time when margins are already razor thin.

I ask that you keep farmers and ranchers in mind when these companies formally file. Agriculture needs a competitive rail system to survive, and we cannot afford changes that would weaken that system further.

Thank you for your consideration on this matter.

Sincerely,
Brennan Kucera



K-Bar Riata Ranch, LLC

Cc: Parties of Record
United States Department of Justice
United States Department of Agriculture,