

October 15, 2025

310246

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

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

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

Dear Office of Chief Counsel,

My name is Joseph Summers, and I'm the proud owner of Minerva Defense, based in Huntsville, Alabama. We're a rapidly growing defense company and a proud part of the fabric of Huntsville's local economy.

I'm writing to express my concern about the proposed merger between Union Pacific and Norfolk Southern. Like many businesses, we depend on reliable rail service to receive essential materials and deliver products to customers across the country. When rail service slows or becomes unreliable, it directly affects our operations — and our bottom line.

Over the years, I've seen how large mergers like this can create real challenges for small and mid-sized businesses. They often lead to slower service, increased delays, and higher shipping costs. Ultimately, those costs get passed down to consumers, which harms everyone.

If this merger goes forward, it will consolidate even more control into the hands of just a few major rail companies. Less competition almost always means higher prices and fewer options, especially for smaller businesses that don't have the leverage of large corporations.

We need a rail system that's competitive, reliable, and fair — one that supports businesses of all sizes, not just the biggest players. I hope the Surface Transportation Board keeps that in mind when evaluating this merger.

Thank you for taking the time to hear from a small business owner who simply wants to keep his company, and his community, moving forward.

Sincerely,

A handwritten signature in cursive script that reads "Joseph Summers".

Joseph Summers
CEO

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