

October 30, 2025

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Office of Chief Counsel
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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 Sunny Black, and I am a small business owner in Madison, Alabama.

Recently, two of the nation's largest railroads — Union Pacific and Norfolk Southern — announced their intent to merge. Businesses like mine depend on reliable rail service to receive supplies and deliver products to our customers efficiently and on time.

As a small business owner, I have seen firsthand the consequences that large consolidations can have on operations across the supply chain. When major rail mergers are poorly executed, service slows, congestion increases, and small businesses like mine bear the brunt of the disruption. These challenges ripple through our local economies, especially impacting small manufacturers and mom-and-pop businesses that lack alternative shipping options.

If this merger is approved, Union Pacific and Norfolk Southern would form a near duopoly, greatly reducing competition across the rail network. A reduction in competition inevitably leads to higher shipping costs and diminished service reliability. When businesses cannot absorb these rising costs, they are passed down to consumers, driving up prices for essential goods and materials.

Fierce competition is vital to ensuring affordability, reliability, and long-term economic growth. I urge the Surface Transportation Board to carefully consider the potential impacts of this proposed merger on small businesses, local economies, and the broader supply chain. Any merger approval should clearly demonstrate measurable benefits to competition, safety, and service performance — not just to shareholders.

Thank you for your thoughtful consideration and continued commitment to preserving a fair, competitive, and efficient rail system.

Sincerely,



Sunny Black

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