

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,

As a government relations professional who has worked extensively across Missouri politics—from local campaigns to statewide races—I’ve seen the powerful impact that policy decisions can have on families, businesses, and communities. Today, I work with a diverse set of stakeholders across the grocery industry, and I am writing to share my concerns regarding the proposed merger between Union Pacific and Norfolk Southern.

For many communities across Missouri and throughout the United States, freight rail isn’t just a logistics tool—it’s a foundation of economic stability. It ensures the consistent flow of goods, which helps families access the essentials they rely on every day. Railroads are a critical link between suppliers and store shelves, and any disruption in that chain has real consequences for both consumers and businesses.

Mergers of this scale can significantly reduce competition in freight markets. When fewer carriers control the rails, shippers often have fewer options, leading to higher transportation costs and, ultimately, higher prices on consumer goods. The grocery industry, already operating on tight margins, cannot absorb those increases without passing some of the costs along. That means working families end up paying more for the same products—especially troubling during times of economic uncertainty.

While efficiency and network coordination may be cited as benefits of consolidation, those gains must be weighed carefully against the potential for market imbalance. Competition is not a luxury—it’s a necessity for a functioning free market and fair prices. Without strong oversight and clear conditions attached to this merger, the risk of diminished service and rising costs becomes too great.

As the Surface Transportation Board reviews this proposed transaction, I urge you to uphold the principles of fairness, transparency, and consumer protection. The decision you make won’t just shape the future of rail—it will impact the cost of groceries, the health of supply chains, and the ability of small and large businesses alike to compete on a level playing field.

Sincerely,



EJ Fleischmann

Cc: Parties of Record
Governor of Missouri
Members of Congress- Missouri