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Office of Chief Counsel
November 13, 2025
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October 13, 2025

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

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

To Whom it May Concern:

My name is Rob Davis, and I'm a corporate executive and longtime resident of Troy, Ohio. Through my career in business, I've seen firsthand how critical reliable and affordable freight rail is to both large and small operations across our state. Whether it's moving raw materials, finished goods, or essential products to local retailers, rail is a backbone of the supply chain that supports jobs and keeps prices stable for families.

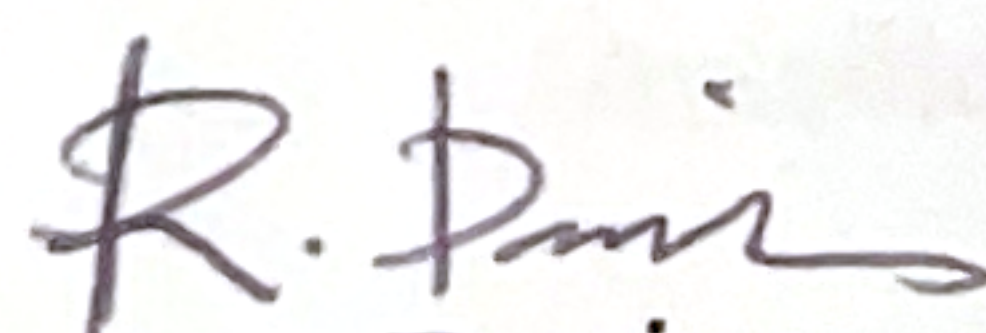
When competition in the rail industry is reduced, the impact is immediate and far-reaching. History has shown that major consolidations often lead to slower service, higher shipping costs, and fewer options for companies trying to stay competitive. Those costs don't stop at the loading dock—they ultimately affect everyday consumers through higher prices for groceries, fuel, and other essentials.

Now, Union Pacific and Norfolk Southern, two of the largest railroads in the United States, are seeking to merge. Without strong safeguards, this merger could consolidate too much control in too few hands, further reducing competition in an industry that already has limited options. For communities like Findlay, that means higher costs for local businesses and added financial strain for working families.

As someone who has spent a career focused on efficiency, innovation, and long-term growth, I know that healthy competition drives progress. I urge the Surface Transportation Board to evaluate this merger with the interests of local communities, small businesses, and consumers in mind. Protecting competition and maintaining a strong, reliable rail network are essential not only for business success but for the economic well-being of families across Ohio.

Thank you for your time and consideration.

Sincerely,


Rob Davis
Troy, Ohio

Cc: Parties of Record, Governor of Ohio, Members of Ohio Congressional Delegation