

October 14, 2025

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



310291

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

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

To the Office of the Chief Counsel:

My name is Dr. Jon Davis, and I've operated a family dental practice here in Findlay, Ohio for many years.

Most people don't immediately think about railroads when they think about dentistry, but like many small-town professionals, I depend on a reliable supply chain. The dental materials, equipment, and products that keep my office running all rely on efficient transportation networks—many of which move through our country's rail system.

That's why I'm deeply concerned about the proposed merger between Union Pacific and Norfolk Southern, two of the largest railroads in the United States. Mergers of this scale have real consequences. When competition is reduced, service often declines, costs rise, and the ripple effects are felt far beyond the rail yard. For small businesses like mine—and for the families we serve—those added costs eventually show up in higher prices for essential goods and services.

If approved, this merger would create a near duopoly in the freight rail industry, concentrating too much power in too few hands. That's rarely good for communities like ours. In my own profession, I've seen how competition keeps quality high and costs reasonable; the same principle applies here.

Ohio's local businesses and working families depend on a strong, competitive rail system that delivers goods efficiently and affordably. I urge the Surface Transportation Board to carefully evaluate this merger and ensure that any conditions placed on it truly protect competition, service, and safety for small communities across our state.

Thank you for your time and consideration.

Sincerely,

Dr. Jon Davis
Jonathan K Davis DDS

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