

October 12, 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

Dear Office of Chief Counsel,

My name is Matt Armbruster, and I am the owner of Ransom Recycling, a small business based in Mobile, Alabama. Most of our employees have only a high school education, but they bring tremendous skill, dedication, and work ethic to their jobs. We are proud to provide meaningful work and contribute to the economic vitality of our community.

Recently, Union Pacific and Norfolk Southern, two of the nation's largest railroads, announced their intent to merge. This proposed merger could have serious negative consequences for small businesses like mine that depend on reliable rail service to receive supplies and deliver products efficiently and on time.

As a small business owner, I have seen firsthand how large consolidations can disrupt operations throughout the supply chain. When major rail mergers are poorly executed, service slows, congestion worsens, and smaller shippers are the first to feel the impact. These disruptions ripple through local economies, especially hurting small manufacturers and family-run operations that lack the leverage or flexibility to find alternative shipping options.

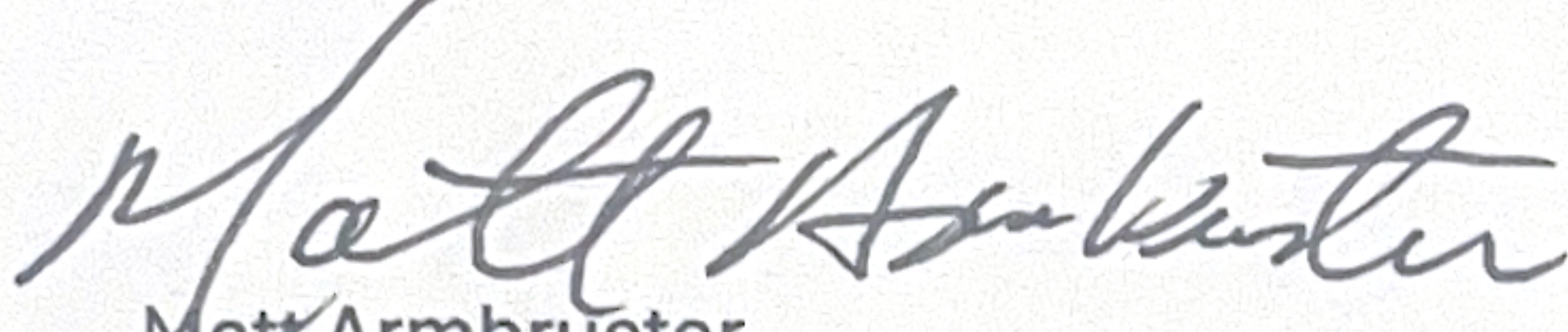
If this merger is approved, Union Pacific and Norfolk Southern would effectively form a near duopoly, reducing competition across much of the national rail network. Less competition inevitably leads to higher shipping costs and diminished service reliability. Those increased costs don't stop with businesses—they're ultimately passed on to consumers in the form of higher prices for essential goods and materials.

Healthy competition is vital to ensuring affordability, reliability, and long-term economic growth. I urge the Surface Transportation Board to carefully evaluate the potential effects of

this merger on small businesses, local communities, and the broader supply chain. Any merger approval should clearly demonstrate measurable benefits to competition, safety, and service performance—not merely financial gains for shareholders.

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

Sincerely,



Matt Armbruster

President

Ransom Recycling

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