

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 Off of the Chief Counsel,

My name is Miles Rihn, and I am an oilfield service contractor that relies on supplies and parts from all over the world.

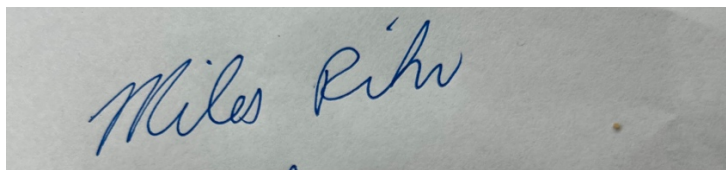
Recently two of the largest railroads in the United States, Union Pacific and Norfolk Southern, announced their intent to merge. Businesses like mine depend on reliable rail service to ship the supplies we need to operate and deliver our products to customers.

As a small business person, I've seen the effect large consolidations can have on small business operations. Poorly executed rail mergers slow service and cause congestion, disrupting the supply chain and our ability to get products to customers – and it's the mom-and-pop stores who are impacted the most.

If the merger is approved, Union Pacific and Norfolk Southern would form a near duopoly. This would be detrimental to competition. I've consistently seen how less competition in rail service leads to higher costs across the board. Unfortunately, when businesses can't absorb these costs, they eventually get passed down to consumers who are forced to pay more for the essential goods and products they need.

Competition drives long-term viability and lower costs. The success of businesses, employees and customers across Texas depend on a strong rail system. When Union Pacific and Norfolk Southern officially file, I hope that the Surface Transportation Board considers the impact on local businesses and ensures the tenets of the merger meet the standards for enhancing competition and safety. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink on a light gray background. The signature reads "Miles Rihn" in a cursive, slightly slanted script. The ink is a medium blue, and the background is a uniform light gray.

Miles Rihn

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