

October 7, 2025

310396

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

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

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

Dear Office of Chief Counsel,

My father-in-law served as a conductor for a freight railroad company for over 40 years. I know from having had conversations with him before he retired that unchecked railroad power once spurred the very creation of America's antitrust laws. Those laws were intended to protect farmers, shippers, and consumers from the whims of railroad barons who dictated prices and routes. Today, despite more than a century of legal precedent, we risk returning to an era where a handful of executives determine who has access to the nation's economic arteries.

Yet for the next year and a half, the STB will go through the motions of analyzing how the creation of the most powerful railroad monopoly in the country will increase competition and lower prices for shippers. They will hold hundreds of hours of public hearings, review tens of thousands of pages of filings from affected parties, spend substantial sums on economic consultants, and produce a lengthy document that justifies what has already been decided.

The only unknown at this point is the location where the President of the United States will get to drive the golden spike celebrating his new transcontinental railroad.

It is interesting to note that the original Transcontinental Railroad Golden Spike ceremony celebrating the 1869 completion of the project did not go entirely to plan. Central Pacific Railroad President Leland Stanford and Union Pacific Vice President Thomas Durant used a silver-plated spike maul to gently tap in the final golden spike so as to not scratch the maul or the spike.

The spike was then removed and the two railroad executives were given an iron spike and iron spike maul that were both wired to the transcontinental telegraph line so the nation could hear the blows as the spike was driven. Stanford took a mighty swing at the spike but hit the tie instead. Durant did not even hit the tie. According to the newspaper account, "Finally, a regular rail worker stepped up to the viewing area to drive in the last spike and the Western Union telegrapher sent the long-awaited message, D-O-N-E."

The upcoming golden spike ceremony will likely go much smoother, but the symbolism will be hard to miss. There will be much speechifying about better service and lower prices, but where the 1869 golden spike represented the opening of a continent, this one will represent the closing of competition.

Unlike the historic telegraph message of 'D-O-N-E,' this time the message our nation's shippers will hear loud and clear is 'Y-O-U-R-M-O-V-E.' Only it won't be a celebration — it will be a warning that the balance of power has shifted decisively away from them. And after it is done and all the dignitaries have left the stage, they will have to step up alone to try and secure the promises of better service and lower prices from a railroad with market power unlike any other in the country.

Sincerely,

A handwritten signature in dark ink, appearing to read "Donna Skipper". The signature is fluid and cursive, with a large initial "D".

Donna Skipper, President

Republican Women of East Alabama

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