

October 22, 2025

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

ENTERED
Office of Chief Counsel
November 13, 2025
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Public Record

To Whom it May Concern:

As business owners and multi-generational farm owners, we have a great understanding of the ripple impact of every economic decision in our country. We have seen the effect large consolidations can have on small business operations, which is why we are particularly concerned about the pending merger between two of the largest railroads in the United States.

This proposed merger between Union Pacific and Norfolk Southern would form a near duopoly and be detrimental to competition. Businesses like ours depend on reliable rail service to ship the supplies we need to operate; farms like ours require consistent transport of our crops. 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 and farms who are impacted the most.

Competition drives long-term viability and lower costs. The success of businesses, employees and customers across Ohio 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,



Mike and Rachel Fearon
Grave-Fearon Insurance
Courageous Creations

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

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