

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

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,

I am writing to share my perspective on the proposed merger between Union Pacific and Norfolk Southern—two major players in the freight rail industry—and to respectfully urge the Board to consider the potential consequences such a merger could have on supply chains, consumer costs, and communities across the country.

Over the course of more than 35 years in the commercial real estate industry, I have held roles ranging from real estate paralegal to corporate real estate manager for a Fortune 100 company and as a practitioner in the private sector of commercial real estate. For seventeen of those years, I worked with SUPERVALU, one of the nation's largest grocery retailers and wholesalers, where I served in several capacities including Retail Development Director, Retail, and Real Estate Manager, Industrial.

During my tenure working with corporate industrial development, I gained a deep appreciation for how essential freight rail is to the consumer products sector as well to Municipal Economic Development Departments. Major infrastructure projects are often influenced by the modalities and efficiencies available to the real estate under consideration.

Rail is not just a transportation option—it is a lifeline for the consumer products supply chain. It ensures that products move efficiently from farms and manufacturers to distribution centers and ultimately to store shelves. When rail service falters or shipping costs climb due to reduced competition, the impact is swift and widespread. All retailers see their costs rise, and consumers—especially those in lower-income communities—bear the burden through higher prices at the checkout counter.

I understand how closely local economies and quality of life are tied to the reliability and affordability of freight services. Rail supports thousands of jobs, helps local businesses thrive, and ensures that families have access to the goods they need every day. Any merger that risks diminishing that system must be carefully examined.

While there may be efficiencies to gain from combining operations, history has shown that consolidation often reduces competition, increases costs, and degrades service. Without strong safeguards in place, this merger could lead to exactly those outcomes—ultimately

making it harder for retailers to stock shelves and more expensive for families to buy consumer products in all categories.

When Union Pacific and Norfolk Southern formally submit their proposal, I urge the Board to prioritize competition, service quality, and consumer protection. Any approval must come with enforceable conditions that prevent monopolistic practices, protect access for shippers, and maintain the safety and reliability of our rail infrastructure.

In short, this decision will not only affect rail companies—it will all of us who rely on fair prices and dependable service.

Sincerely,

A handwritten signature in black ink, reading "Celeste Kososki". The signature is written in a cursive, flowing style.

Celeste Kososki

Cc: Parties of Record
Governor of Missouri
Members of Congress of Missouri