

ENTERED
Office of Chief Counsel
November 13, 2025
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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 have spent 25 years navigating the challenges in the commercial packaging goods industry and have concerns about the proposed merger between Union Pacific and Norfolk Southern.

I know firsthand how essential a competitive, efficient, and diverse transportation network is to keep our economy moving—especially in a state like Missouri, where agriculture, manufacturing, and retail are the backbone of our local communities. Freight rail plays a critical role in this system, but it does not stand alone. Reliable distribution trucks—ranging from local delivery vehicles to regional tractor trailers—are just as vital. Together, these networks ensure that goods reach shelves affordably and on time.

A merger of this scale threatens to upset that balance. Fewer rail operators often means fewer choices for shippers, which leads to increased transportation costs. And when those costs rise, the burden falls not just on businesses, but on consumers. The prices of everyday items usually spike.

Moreover, we can't overlook the impact this merger could have on service reliability. When consolidation limits competition, there's often less incentive to maintain high service standards. This isn't just about freight routes on a map—this is about whether local stores stay stocked and whether small businesses can survive in an already volatile environment.

As someone who has spent a career navigating the challenges of goods distribution, I urge the Surface Transportation Board to take a hard look at the long-term implications of this merger. It's not enough to assess short-term efficiencies. We need a freight network—rail and road alike—that remains competitive, flexible, and fair.

Sincerely,



Rob Salvino

Cc: Parties of Record
Governor of Missouri
Missouri Congressional Delegation