

*Surface Transportation Board
Washington, D.C. 20423-0001
Office of Economics*

FD 36873

310430

November 26, 2025 ENTERED
Office of Chief Counsel
December 4, 2025
Part of
Public Record

Re: Waybill Request WB25-44

I have approved the addition of the following individuals to the waybill access letter in WB25-44.

- a) Aarushi Kataria – Lexecon
- b) Madeline Heyler – Lexecon
- c) Yueru (Josh) Li – Lexecon
- d) Samuel Carless – Lexecon
- e) Richard Brown - FTI Consulting

Prior payment of processing and mailing cost of **\$360** (\$72 per signature) is required and received.

Sincerely,

FRANCIS
O'CONNOR

Digitally signed by
FRANCIS O'CONNOR
Date: 2025.11.26
07:15:54 -05'00'

Francis X. O'Connor
Acting Director
Office of Economics

I have read and understand the conditions for release of the CCWS data. I agree to comply fully with these conditions and the provisions of this confidentiality agreement. No later than thirty days before the agreement expires, I will request an extension of this agreement, if necessary. If no extension is requested, I will return or destroy all CCWS data and certify that I have done so. I have the authority to sign this agreement.

By: Aarushi Kataria

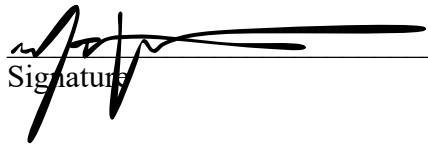
/s/ Aarushi Kataria

Signature

Waybill Agreement WB25-44

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By: Madeline Heyler


Signature

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By: Yueru (Josh) Li



Signature

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By: Samuel Carless

/s/ Samuel Carless

Signature

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By: Richard Brown


Signature

Richard Brown

Peter W. Denton
202 429 6445
pdenton@steptoe.com

Steptoe

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.steptoelaw.com

November 24, 2025

VIA E-MAIL

Director Francis O'Connor
Acting Director, Office of Economics
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423
waybill@stb.gov

Re: **Request for Waybill Data, STB Docket No. FD 36873, Union Pacific Corporation, et al.—Control—Norfolk Southern Corporation, et al.**

Dear Director O'Connor:

On August 7, 2025, we submitted a request, on behalf of BNSF Railway Company ("BNSF"), that BNSF's outside counsel and consultants in the above-referenced proceeding be granted permission to access the confidential Carload Waybill Sample (CCWS) with unmasked revenues for 2019 through 2024 (Waybill Request WB25-44). The request was granted on August 12, 2025. On September 24, 2025, we requested additional access to CCWS data for 1990 through 2018 (Waybill Request WB25-56). The request was granted on September 30, 2025.

Pursuant to 49 C.F.R. § 1244.9(b)(4), we hereby request that the following additional consultants of BNSF in the above-referenced proceeding, none of whom is a regular employee of BNSF, be granted permission to access the confidential CCWS with unmasked revenues in this proceeding for 1990 through 2024:

Compass Lexecon and its employees:

1. Aarushi Kataria
2. Madeline Heyler
3. Yueru (Josh) Li
4. Samuel Carless

FTI Consulting and its employees:

1. Richard Brown

The required fee of \$720.00 (\$72.00 per five (5) individuals for WB25-44 and \$72.00 per five (5) individuals for WB25-56) has been paid on pay.gov per 49 C.F.R. § 1002.2(f)(98)(i).

Director Francis O'Connor
November 24, 2025
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Please contact me with any questions.

Respectfully submitted,

/s/ Peter W. Denton

Peter W. Denton
Attorney for BNSF Railway Company