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October 17, 2025

The Honorable Patrick J. Fuchs  
Chairman  
Surface Transportation Board  
395 E Street SW  
Washington, DC 20423

Subject: Support for Union Pacific and Norfolk Southern Merger

Dear Chairman Fuchs,

As a long-standing partner of both Union Pacific and Norfolk Southern for more than 30 years, Blume Global supports the proposed merger. Blume Global's asset management software solution provides railroads and their customers with a fully integrated platform to digitize and streamline the marketing, reservation, optimization, invoicing, and tracking of rail assets—functions critical to the growth and sustained operation of freight rail service nationwide.

We anticipate this merger will bring substantial advantages for Union Pacific's suppliers and partners, including:

- **Business Growth:** We anticipate that the merged entity will be able to operate more effectively than the entities it replaces and will be better positioned to invest in crucial infrastructure, technology and equipment, enhancing service quality, capacity, and safety. This can create demand and encourage innovation amongst its suppliers and partners. We see potential particularly for this to speed innovation in cutting-edge solutions in IoT, GPS, and AI for error correction.
- **Positive impacts on competition.** A more efficient and competitive freight rail service also has the potential to increase the overall size and competition within the market of suppliers and partners. We support competition as it encourages all participants to develop world-leading solutions that can be developed in the US and then exported to the world.
- **Improved Interline Management:** Many "interchange" points between Union Pacific and Norfolk Southern would become internal transfers within the merged entity. We anticipate Union Pacific's suppliers and partners, including Blume, will have more scope to develop innovative solutions to reduce friction and delays that currently exist when assets move between two distinct Class I railroads.
- **Unified Data Streams:** A unified rail network would allow Union Pacific's suppliers and partners, including Blume, to analyze railroad data more effectively. This would allow for more holistic optimization strategies, predictive analytics, and greater efficiency across the transcontinental network.

We acknowledge the importance of regulatory review and urge authorities to consider the significant positive impact this merger will have on suppliers like Blume Global and the wider economy. Thank you

for considering our perspective; we look forward to the continued growth, innovation, and partnership this merger will foster.

Sincerely,



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cc:     Member Schultz  
          Member Hedlund  
          Parties of Record

