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Via Electronic Mail

December 19, 2025

Ms. Danielle Gosselin
Director, Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423
Danielle.Gosselin@stb.gov

Re: Docket No. FD 36873, *Union Pacific Corporation and Union Pacific Railroad Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company*

Dear Director Gosselin:

On behalf of Union Pacific Railroad Company (“UP”) and Norfolk Southern Railway Company (“NS”), together with their respective holding companies Union Pacific Corporation (“UPC”) and Norfolk Southern Corporation (“NSC”) (collectively, “Applicants”), and in accordance with 49 C.F.R. § 1180.8(a)(2), enclosed please find information on measures that Applicants plan to take to address potentially blocked crossings as a result of merger-related changes in operations or increases in rail traffic.

Please contact me with any questions.

Respectfully submitted,

/s/ Michael L. Rosenthal
Michael L. Rosenthal

Attorney for Union Pacific Corporation and Union Pacific Railroad Company

Enclosure Information on Measures to Address Potentially Blocked Crossings

BEFORE THE
SURFACE TRANSPORTATION BOARD

DOCKET NO. FD 36873

UNION PACIFIC CORPORATION AND UNION PACIFIC RAILROAD COMPANY
—CONTROL—
NORFOLK SOUTHERN CORPORATION AND NORFOLK SOUTHERN RAILWAY
COMPANY

**INFORMATION ON MEASURES TO ADDRESS POTENTIALLY BLOCKED
CROSSINGS AS A RESULT OF MERGER-RELATED CHANGES
IN OPERATIONS OR INCREASE IN RAIL TRAFFIC
(49 C.F.R. § 1180.8(a)(2))**

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December 19, 2025

I. Executive Summary

In accordance with 49 C.F.R. § 1180.8(a)(2), Union Pacific Corporation, Union Pacific Railroad Company (“UP”), Norfolk Southern Corporation, and Norfolk Southern Railway Company (“NS”) (collectively, “Applicants”) are submitting this information on the measures Applicants plan to take to address potentially blocked crossings as a result of merger-related changes in operations or increases in rail traffic.

Both UP and NS have robust programs through which they reduce the impact and frequency of blocked crossings. Following the consummation of the transaction that is the subject of this docket, Applicants expect that UP and NS will continue to operate separate crossing programs in the short term. Applicants will perform a comprehensive review of programs and practices to determine the best practices for the combined railroad. Applicants presently anticipate that the combined railroad will address blocked and potentially blocked crossings by adopting UP’s blocked crossing reduction program, and supplementing UP’s program with some of the features of NS’s program.

During the merger integration period, Applicants will pay attention to the potential for blocked crossings as a result of merger-related changes in operations and increases in rail traffic. In the Operating Plan and associated workpapers submitted with the Application, Applicants have identified specific corridors across the combined UP/NS network where rail traffic is expected to increase as a result of optimizing the combined network and increased traffic drawn to the combined

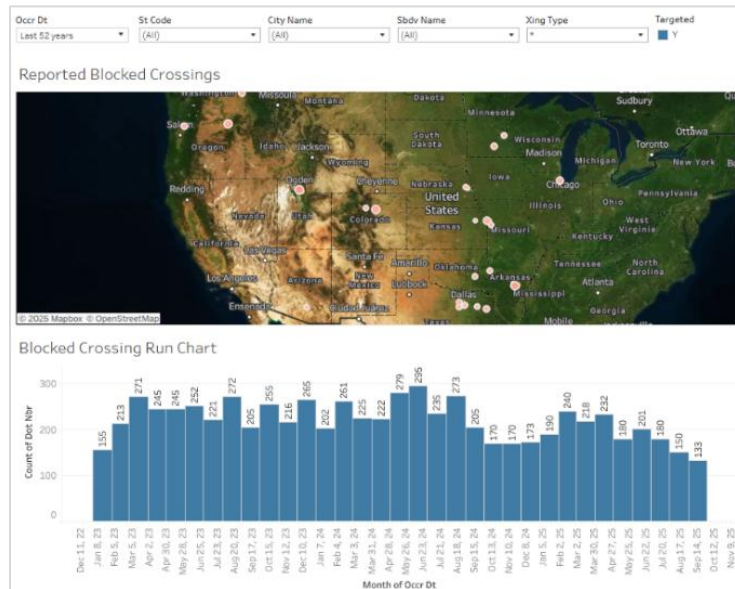
network's offerings. Applicants recognize that this increased traffic, and other operational changes, may result in additional blocked crossings. As described, below, Applicants each have established practices to address such occurrences.

II. Blocked Crossing Reduction Program at UP

UP takes blocked crossings and safety around crossings seriously. It has developed a blocked crossing reduction program that takes a dynamic, data-driven approach to identifying blocked crossings, reducing their impacts and frequency, and tracking progress. The program is supported by a dedicated and cross-functional team of operations professionals, consisting of UP's Response Management Communication Center ("RMCC"); the Operating Practices Blocked Crossing team (the "Blocked Crossing Team"), which is part of the Safety Department; the Public Affairs Department; the Harriman Dispatching Center; and local operating field management teams.

UP's blocked crossing reduction program takes a multi-pronged approach. Members of the public can report blocked crossings to RMCC using the phone number on the Emergency Notification Systems ("ENS") sign at each crossing. These complaints are provided to the Blocked Crossing Team through UP's interactive Blocked Crossing Tableau Site, which tracks blocked crossing reports. The Tableau Site contains a summary and heat map of the reports, which allows the Blocked Crossing Team to identify locations or crossings receiving an increase in reports. An example of the Tableau Site is provided below as Figure 1.

Figure 1
Example of the Interactive Blocked Crossing Tableau Site



The Blocked Crossing Team reviews the Tableau Site daily and coordinates with local operating field management teams or the Harriman Dispatching Center to address the blocked crossing reports. For example, if local teams are performing maintenance work that may be causing blocked crossings, the Blocked Crossing Team will work with the maintenance team as well as the Dispatching Center on ways to mitigate blocked crossings. Mitigation strategies may include making adjustments to maintenance activities or working with the Dispatching Center to hold trains at different areas or times to reduce the potential for blocked crossings. If needed, the Blocked Crossing Team may contact callers who report blocked crossings to obtain more information about the train number, time, or other details related to the blockage.

UP pays special attention to crossings that are most at risk of being blocked, *i.e.*, the crossings that are most reported by the public. These top-impacted crossings

are highlighted in bulletins issued by UP to affected service units. Top-impacted crossings are also displayed on dispatchers' Computer-Aided Dispatch ("CADX") displays to increase awareness of these crossings. This helps train crews and dispatchers plan operations—such as holding a train short of the crossing—to avoid the potential for blockages.

Additionally, using Positive Train Control-Global Positioning System ("PTC-GPS") data, UP provides dispatchers with real-time alerts and notifications when targeted crossings are blocked for more than ten minutes. These alerts are provided via email and pop-up notifications called Train Management Alerts ("TMA") and are supplemented by visual aids displayed on dispatchers' CADX displays and train engineers' PTC interfaces. These alerts provide dispatchers real-time updates so they can take action to address the blocked crossing. Such actions may include contacting the stopped train to advise the crew on how to clear the crossing or holding other trains nearby until the crossing is cleared. Where feasible, operating schedule changes are made to reduce congestion at top-impacted crossings.

UP has also partnered with the communities in which it operates to reduce the frequency of blocked crossings and enhance safety. For example, in Houston, Texas, UP has worked closely with public stakeholders to identify critical roadway crossings that are close to schools, serve as emergency response corridors, or see high volumes of public traffic. To enhance situational awareness, these critical crossings are visibly marked on dispatchers' CADX displays. Additionally, dispatchers receive TMAs whenever a designated critical crossing is occupied for more than 20 minutes (similar

to TMAs sent when top-impacted crossings are blocked for more than ten minutes). If a crossing remains occupied for more than 30 minutes, UP notifies Houston emergency responders so emergency responders can use alternate emergency response corridors.

UP also works with governmental agencies to support public agency funding applications for grade separation projects. From about February 1, 2019, through May 30, 2025, UP collaborated with public agencies in 17 states on over 755 grade separation projects, including new greenfield grade separations, reconstruction of existing grade separations, and maintenance projects. UP contributed over \$9 million towards the cost of those projects.

III. Blocked Crossing Reduction Program at NS

NS takes blocked crossings seriously and is committed to the safety of those in the local communities in which it operates. NS has a team, led by the Director of Public Engagement, tasked with identifying and mitigating blocked crossings across its network. Other key team members come from Safety, the Network Operations Center, Transportation, Strategic Planning, and Government Relations.

To address blocked crossings, NS evaluates chronic issues to identify the locations that can be mitigated through operational changes. First, NS identifies these issues through the Federal Railroad Administration's ("FRA") Blocked Crossing Portal and internal data from calls that come into the Police Communications Center. Second, NS takes action to address blocked crossings through internal and external measures. For example, NS examines certain locations with a history of blocked

crossings to identify whether operational changes are feasible and would reduce the frequency of blocked crossings. NS also issues bulletins to reinforce orders to train crews and dispatchers. An additional internal measure that frequently requires external support involves assessing siding extensions and other capital expenditure projects to ensure compatibility with at-grade crossings and prevent construction conflicts, safeguarding long-term asset performance.

When internal measures are not sufficient, NS collaborates with local governments and organizations to identify and secure funding for public infrastructure projects to mitigate blocked crossings. This includes eliminating at-grade crossings with the construction of grade separated structures, or in some cases, road realignments or extensions. Examples of these programs at the federal level are the Consolidated Rail Infrastructure and Safety Improvements program and the Rail Crossing Elimination program. Programs using state funds, such as the Indiana Department of Transportation's LocalTrax program, have also been successful in completing projects that improve safety while eliminating the possibility of blocked crossings. Other external measures to reduce impacts of occupied crossings include technology-driven projects from outside vendors.

IV. Measures to Address Potentially Blocked Crossings as a Result of Merger-Related Changes in Operations or Increases in Rail Traffic

As noted above, following the merger, UP and NS will continue to operate their existing crossing reduction programs. Applicants will then develop a plan to integrate their programs and expect that the combined railroad will eventually follow UP's blocked crossing reduction program as enhanced by parts of NS's program.

Throughout this process, UP and NS will take proactive measures to address crossings where traffic is expected to increase. UP's Blocked Crossing Team will lead the integration process.

Applicants will take in reports from members of the public about blocked crossings. Initially, these reports will be received by UP and NS separately, based on the phone number on the ENS sign at the relevant crossing. Following the initial period of review before integration, the 24-hour emergency phone number on NS's ENS signs will be forwarded and responded to by UP's RMCC, which will coordinate on a response using current UP protocols. Over time, the primary operating railroad and the 24-hour emergency number will be changed on all legacy NS ENS signs to reflect the UP RMCC number.

Similarly, initially the reports of blocked crossings will be forwarded by UP and NS's call centers to the respective UP and NS teams. Eventually, there will be a single blocked crossings team that reviews all reports. UP will continue to use the interactive Blocked Crossing Tableau Site to identify trends in reports of blocked crossings and track progress on the mitigation of blocked crossings. The site will eventually be expanded to cover the combined railroad.

The relevant teams will review complaints, work with local operations, and coordinate with the dispatch centers to address recurring issues. Initially, both UP and NS teams will be responsible for crossings in their portion of the railroad. Eventually, a singular team will be responsible for all blocked crossings.

UP will continue to highlight the top-impacted crossings in bulletins issued to affected service units and on dispatchers' CADX displays. Eventually, a singular team for the combined railroad will issue these bulletins, and the combined CADX for the railroad will also highlight these grade crossings.

Using PTC-GPS data, UP will continue providing dispatchers with real-time alerts and notifications when a top-impacted crossing is blocked longer than ten minutes, so dispatchers can work with the affected trains to clear the crossing. These alerts will be provided by email and TMA, and will be supplemented by visual aids displayed on both the dispatcher's CADX display and the train engineer's PTC interface. Eventually, these alerts and notifications will be supplied to dispatchers across the combined railroad.

UP and NS will continue to identify and implement operating changes to reduce congestion at top-impacted crossings. Eventually, a single group will be responsible for identifying potential operating changes to reduce blocked crossings. UP and NS will also collaborate with the Department of Transportation, FRA, and state agencies to support public agency funding applications for grade separation projects, including for crossings where train traffic arising from the merger significantly increases the actual occurrence of blocked crossing complaints.