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BNSF-21

VIA E-FILING

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

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

Dear Chief of Case Administration:

Enclosed please find a letter regarding the proposed transaction in the above-referenced proceeding from Mayor Mattie Parker, City of Fort Worth, Texas.

Respectfully submitted,

/s/ Peter W. Denton

Peter W. Denton
Attorney for BNSF Railway Company



March 31, 2026

The Honorable Patrick Fuchs, Chair
Surface Transportation Board
395 E Street, NW
Washington, DC 20423

The Honorable Michelle Schultz, Vice Chair
Surface Transportation Board
395 E Street, NW
Washington, DC 20423

The Honorable Karen Hedlund, Member
Surface Transportation Board
395 E Street, NW
Washington, DC 20423

Re: Proposed Union Pacific–Norfolk Southern Merger

Dear Chairman Fuchs, Vice Chair Schultz, and Member Hedlund:

On behalf of the City of Fort Worth, Texas, we write to share our serious concerns regarding the proposed merger between Union Pacific Railroad and Norfolk Southern Railway.

Fort Worth is one of the most important freight rail cities in Texas and the nation. Our economy depends on reliable and competitive rail service to support many industries including manufacturing, logistics and distribution, construction materials, energy, and agriculture. As one of the fastest growing large cities in the country, Fort Worth also experiences firsthand the interaction between freight rail operations and the daily lives of our residents.

The City is concerned that a merger of this scale could further reduce competition in an already highly concentrated freight rail industry. Many Fort Worth–area businesses depend on competitive rail service to control costs and remain viable. A loss of competition risks higher shipping costs that are ultimately passed along to consumers in the form of increased prices for goods and services across our region.

Beyond economic impacts, the City is equally concerned about the potential effects on neighborhoods and public safety. Rail corridors in Fort Worth run directly through or alongside growing residential areas and major roadway networks. Increased congestion or service disruptions could lead to longer and more frequent blockages at grade crossings – particularly in areas near industrial corridors and intermodal activity – affecting local traffic flow, emergency response times, and daily commuting. These impacts are felt most acutely by working families and small businesses.

Fort Worth has also invested significantly in modernizing key transportation corridors and supporting industrial growth areas that rely on predictable freight movement.

MAYOR MATTIE PARKER

Disruptions or congestion associated with a major rail integration could add truck traffic to already strained roadways, undermining these investments and increasing safety concerns for nearby communities.

The City recognizes the Surface Transportation Board's responsibility to ensure that rail transactions serve the public interest. From Fort Worth's perspective, any merger of this magnitude should clearly demonstrate that it will improve outcomes for consumers, businesses, and communities – not merely reallocate market power among carriers. The City urges the Board to reject this proposed merger unless the applicants can show that it will:

- meaningfully strengthen competition in freight rail service;
- provide greater service options and reliability for rail dependent businesses; and
- avoid adverse impacts to congestion, safety, and quality of life in the communities the rail system serves.

Absent these assurances, the City of Fort Worth is concerned that the proposed merger could lead to long-term economic and community impacts that outweigh any claimed efficiencies.

We appreciate the Board's careful consideration of the public interest and respectfully ask that the voices of local communities like Fort Worth remain central to its review.

Sincerely,

A handwritten signature in black ink that reads "Mattie Parker". The signature is fluid and cursive, with the first name "Mattie" being more prominent than the last name "Parker".

Mattie Parker
Mayor, City of Fort Worth

cc:
Senator John Cornyn
517 Hart Senate Office Building
Washington, DC 20510

Senator Ted Cruz
167 Russell Senate Office Building
Washington, DC 20510

Congressman Craig Goldman
1716 Longworth House Office Building
Washington, DC 20515

MAYOR MATTIE PARKER

Congresswoman Beth Van Duyne
1725 Longworth House Office Building
Washington, DC 20515

Congressman Roger Williams
2336 Rayburn House Office Building
Washington, DC 20515

Congressman Brandon Gill
1305 Longworth House Office Building
Washington, DC 20515

Congressman Marc A. Veasey
2186 Rayburn House Office

CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing letter to be served electronically or by first-class mail, postage pre-paid, on the Secretary of Transportation, the Attorney General of the United States, Applicants' representatives, Administrative Law Judge Jenifer Soulikias, and all parties of record in this proceeding.

/s/ Onika K. Williams

Onika K. Williams
Attorney for BNSF Railway Company

April 1, 2026