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May 27, 2026

Surface Transportation Board
395 E Street, SW
Washington, DC 20423

RE: Notice of Intent to Participate ~ Union Pacific & Norfolk Southern Railroad Merger

Board Members,

It is with great interest that I, on Behalf of the East Brookfield & Spencer Railroad (EBSR), communicate to you my concerns regarding the proposed merger of the Union Pacific and Norfolk Southern Railroads which are currently under review by your Board.

The EBSR, a short line railroad, created the New England Automotive Gateway rail redistribution center 21 years ago. It is located along the CSXT Boston Albany mainline and Route 49 in central Massachusetts. Our facility encompasses over 75 acres, servicing offering well-paying job opportunities to over 150 associates. The facility receives railcars from nearly 30 auto plants throughout North America.

EBSR feels that the contemplated transcontinental merger between the UP & NS before you would greatly impact the viability of our facility by creating a near monopoly for important shipping lanes that the 8 auto manufacturers who we service at our site use (GM, Ford, Honda, Subaru, Hyundai, Kia, Nissan & VW). We anticipate that the resultant lack of interline alternatives will impact our business by lowering our volume by nearly one-third.

The current balance of 2 eastern, 2 western and 2 Canadian Class I railroads offer a truly competitive environment allowing the marketplace real choices and the benefits of competitive costs, efficient service and superior quality. Allowing the UP/NS merger will turn the remaining Class I railroads into regional carriers, eroding these competitive advantages and in the long-term greatly impacting their ability to reinvest to maintain their infrastructure.

Thank you for the opportunity to participate in this review process.

Respectfully yours,

George W. Bell, II
Chief Economic Officer

CC: Parties of Record