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ENTERED
Office of Chief Counsel
June 25, 2026
Part of
Public Record

Hon. Jenifer J. Soulikias
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: STB Docket No. FD 36873 – Issues for Resolution.

Dear Judge Soulikias:

Pursuant to Decision No. 24, the Union Pacific Railroad - Norfolk Southern Railroad Merger.

With every railroad merger, what the merging railroads never discussed is potential congestion that is created because of,

- Laying off managers who know how the railroad works.
- The furlough of the operations personnel that run the trains.
- Computer software that doesn't talk between the two-merging railroad.

Discuss what Rail Lines might be sold or abandoned?

- As Redundant lines
- To or newly formed Regional Railroads.
- To or newly formed Shortline Railroads.

The conversion of taking 2,100,000 trucks off the highways. This is equal to 2,100,000 containers which is then converts to 10,500 Double Stack Intermodal Trains.

- How will this be financed?
- Why aren't both railroads already attempting to achieve this goal? Claiming that the merger will simplify this process isn't accurate. The assertion that interline services and interchanges will become quicker is misleading. Historically, rail mergers have never achieved the promised reduction in truck traffic.
- Where will the expansion of ocean and inland ports occur? Land availability is limited everywhere, and acquiring land through eminent domain takes years.
- The numbers equate to 10,500 stack trains. Railroads are already congested at the ports; how and where will additional capacity be constructed to alleviate this congestion?
- What is the timeline for implementation? If immediate, it seems unlikely, as existing rail lines cannot support the increased traffic.
- Where will the required equipment come from?
- Where will the necessary crews come from? Railroads struggle to maintain current employment levels. This need extends beyond railroads to include port workers, truck drivers, back-office management, logistics, maintenance, and crane operators. Below are links discussing crew issues in the rail industry that support the question.



Opinion, there should be Three Operational Trunk Lines, Heading from West to East,

- Northern Route – Seattle, Chicago to Boston and New York
- Middle Route – Long Beach, Kansas City, St Louis, Memphis, Baltimore, Norfolk.
- Southern Route, - Border / FXE, Houston, Shreveport, New Orleans, Mobile, Jacksonville.

These videos presented below offer insight to the status of railroad employment.

- <https://www.youtube.com/watch?v=R7Lmi6cXw2g>
- <https://www.youtube.com/watch?v=QXDoOfAjI5s>
- <https://www.youtube.com/watch?v=edcmgkVFqn4&t=157s>
- <https://www.youtube.com/watch?v=K2EkjuEWZhk>

CERTIFICATE OF SERVICE

I certify that I caused the foregoing 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.

Daniel M. Bigda
M4 Railcar Group
June 25, 2026