

*Surface Transportation Board
Washington, D.C. 20423-0001
Office of Economics*

ENTERED
Office of Chief Counsel
July 1, 2026
Part of
Public Record

June 8, 2026

Re: Waybill Request WB25-44

I have approved the addition of the following individuals to the waybill access letter in WB25-44.

- a) Molly Bruder Fox – Steptoe LLP
- b) Joshua H. Runyan – Steptoe LLP
- c) Tara Woods – Steptoe LLP
- d) Kim Hooks – Steptoe LLP
- e) Tate Volbrecht – Kirkland & Ellis LLP
- f) Neil Joseph – Kirkland & Ellis LLP
- g) Hao Nguyen – Compass Lexecon
- h) Yuchen (Cindy) Yang – Compass Lexecon

Prior payment of processing and mailing cost of **\$576** (\$72 per signature) is required and received.

Sincerely,

MARTIN
SCHLENKER

Digitally signed by
MARTIN SCHLENKER
Date: 2026.06.08
11:32:52 -04'00'

Martin Schlenker
Acting Director
Office of Economics

I have read and understand the conditions for release of the CCWS data. I agree to comply fully with these conditions and the provisions of this confidentiality agreement. No later than thirty days before the agreement expires, I will request an extension of this agreement, if necessary. If no extension is requested, I will return or destroy all CCWS data and certify that I have done so. I have the authority to sign this agreement.

By: Molly Bruder Fox

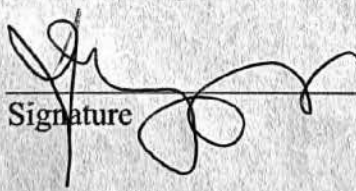
/s/ Molly Bruder Fox

Signature

Waybill Agreement WB25-44

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By: Joshua H. Runyan


Signature

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By: Tara Woods

/s/ Tara Woods

Signature

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By: Kim Hooks

/s/ Kim Hooks

Signature

Waybill Agreement WB25-44

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By: Tate Volbrecht

/s/ Tate Volbrecht

Signature

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By: Neil Joseph

/s/ Neil Joseph

Signature

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By: Hao Nguyen

A handwritten signature in black ink, appearing to read "Hao Nguyen", written in a cursive style.

Signature

Waybill Agreement WB25-44

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By: Yuchen (Cindy) Yang

A handwritten signature in black ink, appearing to read 'Yuchen' followed by a stylized flourish.

Signature

Peter W. Denton
202 429 6445
pdenton@steptoe.com

Steptoe

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.steptoe.com

June 2, 2026

VIA E-MAIL

Director Francis O'Connor
Acting Director, Office of Economics
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423
waybill@stb.gov

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

Dear Director O'Connor:

On August 7, 2025, we submitted a request, on behalf of BNSF Railway Company ("BNSF"), that BNSF's outside counsel and consultants in the above-referenced proceeding be granted permission to access the confidential Carload Waybill Sample (CCWS) with unmasked revenues for 2019 through 2024 (Waybill Request WB25-44). The request was granted on August 12, 2025. On September 24, 2025, we requested additional access to CCWS data for 1990 through 2018 (Waybill Request WB25-56). The request was granted on September 30, 2025. On November 24, 2025, we requested that additional individuals be provided access to CCWS data for 1990 through 2024 under WB25-44 and WB25-56. The requests were granted on December 4, 2025.

Pursuant to 49 C.F.R. § 1244.9(b)(4), we hereby request that the following additional counsel and consultants of BNSF in the above-referenced proceeding, none of whom is a regular employee of BNSF, be granted permission to access the confidential CCWS with unmasked revenues in this proceeding for 1990 through 2024:

Steptoe LLP and its employees:

1. Molly Bruder Fox
2. Joshua H. Runyan
3. Tara Woods
4. Kim Hooks

Kirkland & Ellis LLP and its employees:

1. Tate Volbrecht
2. Neil Joseph

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Compass Lexecon and its employees:

1. Hao Nguyen
2. Yuchen (Cindy) Yang

The required fee of \$1,152.00 (\$72.00 per eight (8) individuals for WB25-44 and \$72.00 per eight (8) individuals for WB25-56) has been paid on pay.gov per 49 C.F.R. § 1002.2(f)(98)(i).

Please contact me with any questions.

Respectfully submitted,

/s/ Peter W. Denton

Peter W. Denton
Attorney for BNSF Railway Company