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July 6, 2026

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

CN-22

VIA ELECTRONIC FILING

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

Dear Chief of Case Administration:

On June 24, 2026, the United States Department of Agriculture (“USDA”) filed a motion for a Supplemental Protective Order to govern USDA’s access to confidential information produced in these proceedings.¹ Grand Trunk Corporation and its U.S. rail operating subsidiaries² (collectively, “CN”) have provided certain information designated Highly Confidential or Confidential under the existing Protective Order to the Applicants in these proceedings, including CN’s 2019-2025 traffic tapes. We write to confirm that to the extent that the Amended Application, related workpapers, or other materials submitted in these proceedings contain CN’s Highly Confidential or Confidential information, CN does not object to USDA’s requested Supplemental Protective Order to facilitate their access to CN’s information and thus their participation in these proceedings. The Board’s regulations

¹ United States Department of Agriculture Motion for Supplemental Protective Order, FD 36873 (filed June 24, 2026).

² Bessemer and Lake Erie Railroad Company, Cedar River Railroad Company, Chicago, Central & Pacific Railroad Company, Grand Trunk Western Railroad Company, Illinois Central Railroad Company, Iowa Northern Railway Company, The Pittsburgh & Conneaut Dock Company, and Wisconsin Central Ltd.

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expressly encourage participation by federal government departments and agencies.³ USDA's requested Supplemental Protective Order will allow USDA to access the information necessary to evaluate the proposed transaction and participate fully.

Very truly yours,

/s/ Sara Razi

Sara Y. Razi

³ See 49 C.F.R. § 1180.1(m).

CERTIFICATE OF SERVICE

I hereby certify that, on this 6th day of July 2026, I caused a true and correct copy of the foregoing to be served by first-class mail or email on all parties of record in this proceeding, the Secretary of Transportation, the Attorney General, and Administrative Law Judge Jenifer Soulikias.

/s/ Andrew Bernstein

Andrew Bernstein

Sr. Paralegal Manager

Simpson Thacher & Bartlett LLP