

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

311763

ENTERED
Office of Chief Counsel
July 10, 2026
Part of
Public Record

July 10, 2026

Re: Waybill Request WB26-26

I have approved the addition of the following individuals to the waybill access letter in WB26-66.

- a) Naibin Chen – Bates White Economic Consulting
- b) Xunjie Zheng – Bates White Economic Consulting

Prior payment of processing and mailing cost of **\$144** (\$72 per signature) is required and received.

Sincerely,

MARTIN
SCHLENKER

Digitally signed by
MARTIN SCHLENKER
Date: 2026.07.10
10:38:25 -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: Naibin Chen

/s/ Naibin Chen

Signature

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: Xunjie Zheng

/s/ Xunjie Zheng

Signature

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July 9, 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 32760 (Sub-No. 52), BNSF Railway Company – Petition for Review – UP/SP Merger Conditions**

Dear Director O'Connor:

On June 3, 2026, 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 data ("CCWS") with unmasked revenues for 1990 through 2024 and comparable data for 2025 when it becomes available. This request was granted on June 30, 2026.

Pursuant to 49 C.F.R. § 1244.9(b)(4), we respectfully request that the following additional 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 (including all records, all fields, and confidential unmasked revenues) for all traffic for 1990 through 2024, and comparable data for 2025 when it becomes available, for this proceeding:

Bates White Economic Consulting and its employees:

1. Naibin Chen
2. Xunjie Zheng

The required fee of \$144.00 (\$72.00 per two (2) individuals) has been paid on pay.gov per 49 C.F.R. § 1002.2(f)(98)(i).

Director Francis O'Connor
July 9, 2026
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Please contact me with any questions.

Respectfully submitted,

/s/ Brian G. Liegel

Brian G. Liegel
Attorney for BNSF Railway Company