

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB FINANCE DOCKET NO. 36873

**UNION PACIFIC CORPORATION, ET AL.
—CONTROL—
NORFOLK SOUTHERN CORPORATION, ET AL.**

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ENTERED
Office of Chief Counsel
July 16, 2026
Part of
Public Record

**NS'S RESPONSES AND OBJECTIONS TO INTERROGATORIES IN IOWA
INTERSTATE RAILROAD, LLC'S FIRST SET OF DISCOVERY REQUESTS
TO NORFOLK SOUTHERN**

Pursuant to 49 C.F.R. Part 1114 and other applicable rules and authority, Norfolk Southern Corporation and Norfolk Southern Railway Company (together, "Norfolk Southern" or "NS"), through undersigned counsel, respond as follows to the requests for interrogatories in Iowa Interstate Railroad, LLC's ("IAIS's") First Set of Discovery Requests ("Requests"). Pursuant to the Discovery Guidelines in this proceeding, NS responded to the requests for the production of documents on July 1, 2026. NS's responses and objections to these Requests are based on NS's present knowledge, information, and belief. NS reserves the right to supplement or amend these Responses and Objections at any time as circumstances may require.

GENERAL RESPONSES AND OBJECTIONS

NS incorporates by reference the General Responses and Objections contained in NS's Responses and Objections to Document Requests in IASI's First Set of Discovery Requests to Applicants. Those General Responses and Objections are to be considered objections to each of the specific discovery requests that follow.

NS's Responses and Objections to these Requests are based on NS's present knowledge, information, and belief. NS's Objections shall not waive or prejudice any objections that it may later assert.

SPECIFIC RESPONSES AND OBJECTIONS

In addition to its General Objections (which apply in full to each and every Request without further enumeration), NS sets forth Specific Objections and Responses to each Interrogatory below. NS preserves all of its General Objections as incorporated above, and none of the following Specific Objections shall waive its General Objections. Nor shall any of NS's Specific Objections limit the scope, breadth, generality, or applicability of those General Objections.

INTERROGATORY NO. 1

Identify the (a) Person(s) employed by UP and (b) Person(s) employed by NS who are most knowledgeable about current freight transportation arrangements between IAIS and UP and between IAIS and NS, respectively, including but not limited to rail switching (including reciprocal switching) service, interline and joint line rail service provided to rail shippers, joint facilities arrangements and "first mile/last mile" service provided by IAIS for line haul movements on UP and NS, respectively.

Response:

Subject to and without waiving the below objections and its General Objections, NS responds that Michael R. McClellen, Senior Vice President & Chief Strategy Officer, is the person employed by Norfolk Southern who oversees the management of the current freight transportation arrangements between IAIS and NS.

NS objects to this Interrogatory as not reasonably calculated to lead to the discovery of relevant, admissible evidence. NS further objects to this Interrogatory as vague and ambiguous in that it asks NS to identify the employee "most knowledgeable" about the list of topics identified in the Interrogatory. NS further objects to this Interrogatory to the extent it purports to require NS to provide business mailing addresses and telephone numbers for individual employees. NS further objects to this Interrogatory as overly broad and unduly burdensome to the extent it asks NS to respond to a request on behalf of Union Pacific and requests information that is not in NS's possession, custody or control.

INTERROGATORY NO. 12

Describe in detail any projections or forecasts of the annual number of intermodal unit lifts that Applicants expect will be performed by a new intermodal ramp constructed by UP in the vicinity of Council Bluffs, Iowa following consummation of the Proposed Transaction, that is described in pages 918-919 of the Verified Statement of John W. Turner in Volume 2 of the Application.

Response:

NS objects to this Interrogatory as overly broad, unduly burdensome, disproportionate to the needs of this proceeding, and not reasonably calculated to lead to the discovery of relevant, admissible evidence. NS objects to the Interrogatory as overly broad and unduly burdensome to the extent it asks NS to respond to a request on behalf of Union Pacific and requests information that is not in NS's possession, custody or control. NS further objects to this Request to the extent it seeks production of publicly available information or information that IAIS could obtain through less burdensome means, including by reviewing documents

that are publicly available on the Surface Transportation Board's docket and/or with which IAIS has been served.

Subject to and without waiving the below objections and its General Objections, NS directs IAIS to the Verified Statement of John W. Turner in Volume 2 of the Amended Application, filed with the Surface Transportation Board on April 30, 2026, and accompanying workpapers, specifically "UP Manifest-Intermodal-Automotive Terminal Volume-Capacity Summary.xlsx" and "UP Manifest-Intermodal-Automotive Terminal Capacity Inputs & Calculations.xlsx," which describe Union Pacific's consideration of the construction of a new intermodal ramp in the vicinity of Council Bluffs, Iowa.

INTERROGATORY NO. 13

Describe in detail any projections or forecasts of the annual number of intermodal unit lifts that Applicants expect will be performed by the IAIS intermodal ramp that currently is in operation in the vicinity of Council Bluffs, Iowa and is referred to on pages 918-919 of the aforementioned Turner Verified Statement, following construction of the UP intermodal ramp referenced in Interrogatory No. 2.

Response:

NS objects to this Interrogatory as overly broad, unduly burdensome, disproportionate to the needs of this proceeding, and not reasonably calculated to lead to the discovery of relevant, admissible evidence. NS further objects to the Interrogatory as overly broad and unduly burdensome to the extent it asks NS to respond to a request on behalf of Union Pacific and requests information that is not in NS's possession, custody or control. NS further objects to this Request to the extent it seeks production of publicly available information or information that IAIS

could obtain through less burdensome means, including by reviewing documents that are publicly available on the Surface Transportation Board's docket and/or with which IAIS has been served.

Subject to and without waiving the below objections and its General Objections, NS directs IAIS to the Verified Statement of John W. Turner in Volume 2 of the Amended Application, filed with the Surface Transportation Board on April 30, 2026, and accompanying workpapers, specifically "UP Manifest-Intermodal-Automotive Terminal Volume-Capacity Summary.xlsx" and "UP Manifest-Intermodal-Automotive Terminal Capacity Inputs & Calculations.xlsx," which describe Union Pacific's consideration of the construction of a new intermodal ramp in the vicinity of Council Bluffs, Iowa.

INTERROGATORY NO. 14

Describe in detail the measures that Applicants intend to take to ensure that no Class II or Class III rail carrier will lose or experience a reduction in access to a port or a Class I railroad other than Applicants as a result of the Proposed Transaction, as referenced on pages 23-24 of Decision No. 21 served in Docket No. FD 36873 on May 28, 2026.

Response:

NS objects to this Interrogatory as overly broad, unduly burdensome, disproportionate to the needs of this proceeding, and not reasonably calculated to lead to the discovery of relevant, admissible evidence. NS further objects to this Interrogatory as premature to the extent it seeks information that Applicants have been directed to provide as part of the supplemental information due July 27, 2026 in response to Decision No. 21, including the Board's directive concerning Class II

and Class III carrier and port access. NS further objects to the Request as overly broad and unduly burdensome to the extent it asks NS to respond to a request on behalf of Union Pacific and requests information that is not in NS's possession, custody or control.

Subject to and without waiving the below objections and its General Objections, Norfolk Southern directs IAIS to the information provided in its Amended Application and accompanying workpapers, filed with the Surface Transportation Board on April 30, 2026, as well as its forthcoming supplemental submission in response to Decision No. 21.

/s/ Matthew J. Warren

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Date: July 9, 2026

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of July, 2026, a copy of the foregoing
“NS’s Responses and Objections to Interrogatories in Iowa Interstate railroad,
LLC’s First Set of Discovery Requests to Norfolk Southern” was served by email or
first class mail on the service list for Finance Docket No. 36873.

/s/ Matthew J. Warren
Matthew J. Warren