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July 27, 2026

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

Re: Surface Transportation Board Docket No. FD 36873

Dear Judge Soulikias:

We are writing to express our opposition and concerns regarding the application to merge two of the country's largest railroad companies, Union Pacific and Norfolk Southern, into a single mega-railroad.

This transaction would not advance a cleaner, more efficient, sustainable, safer freight system in this country. Instead, the runaway monopoly created by this merger would advance an industry-wide trend of increasing profit margins for a small group of CEOs and shareholders, while pushing negative ramifications onto the general public: driving up prices for the railroad's customers, worsening the working conditions for its workers, and, importantly, risking the health and environment of the communities that live near its corridors and yards.

In order for the Surface Transportation Board ("Board") to make an informed decision on this application, it must weigh potential benefits against merger-related harms.¹ The Board's decision must include consideration of environmental matters (including public health and safety)² and the Board should not issue a decision without the imposition of appropriate conditions so long as environmental issues remain unresolved.³ In particular, the Board should address the especially heightened and exacerbated health, safety, environmental, and economic vulnerabilities that frontline communities and workers face based on their proximity to freight operations.⁴ That proximity is associated with other markers of vulnerability; of the 101 railyards that exceed the Board's reporting thresholds for carload activity⁵ or truck traffic growth⁶ under the merger plan,⁷ the majority fall within 1,000 feet of a disadvantaged community.⁸

The inequitable burdens that frontline communities and workers face each day have a material impact on their lives. Despite the improvements to efficiency, air quality, and associated health outcomes that could be achieved with tried, tested, and economically viable electrification solutions, our freight system remains heavily dominated by outdated diesel-burning fleets of locomotives, trucks, and other vessels. These fleets are responsible for an estimated \$6.5 billion in costs to community health annually from ambient oxides of nitrogen (NOx) and fine particulate matter (PM2.5).⁹ As environmental justice groups such as the Moving Forward Network have raised to the federal government before, exposure to these diesel freight-linked pollutants not only worsens the quality of life for those exposed but also

¹ 49 C.F.R. § 1180.1(c).

² 49 C.F.R. § 1105.7(e)(7)(i).

³ 49 C.F.R. § 1105.10(f).

⁴ See, e.g., California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective* (April 2005),

<https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf> (recommending that decisionmakers "[a]void siting sensitive land uses within 1,000 feet of a major service and maintenance rail yard" and finding that for the studied site, "[t]he area of highest impact is within 1,000 feet" and that the study "clearly indicates that the localized health risk is high, the impact area is large, and mitigation of the locomotive diesel PM emissions is needed.").

⁵ 49 C.F.R. § 1105.7(e)(5)(i)(B), (ii)(B).

⁶ 49 C.F.R. § 1105.7(e)(5)(i)(C), (ii)(C).

⁷ See STB Finance Docket 36873, "UP-NS Response to OEA Request #3," Tables A3, A4, Document ID 34227, 34228 (May 28, 2026).

⁸ "Disadvantaged Communities" are those identified by the Council of Environmental Quality's 2024 Climate & Economic Justice Screening Tool (CEJST 2.0), now preserved by Harvard Law School's Environmental & Energy Law Program: <https://eelp.law.harvard.edu/tracker/ceqs-climate-economic-everydayjustice-screening-tool-remothatved/>.

⁹ International Council on Clean Transportation, *Zero-emission Locomotive Technologies: Pathways for U.S. Rail Decarbonization* (June 2024), <https://theicct.org/publication/zero-emission-locomotive-technologies-pathways-for-u-s-rail-decarbonization-jun24/>.

shortens it.¹⁰ Human health impacts associated with NOx and PM2.5 include harmful respiratory effects, cardiovascular effects, cancers, and premature mortality.¹¹ That harm is built into the intended functioning of rail operations; when operations go wrong (as they often do for these companies, due in part to corner-cutting on best safety practices), communities are also exposed to derailments that have had and continue to have disastrous long-term consequences (as was seen in the aftermath of Norfolk Southern’s East Palestine incident, which the Federal Railroad Administration attributed, in part, to avoidable issues such as inadequate on-duty staffing levels).^{12, 13} If prior major rail mergers are any indication, these disasters and service disruptions are likely to increase if this proposal is approved. As the Class I railroads consolidate into too-big-to-fail mega-companies, they will continue their trend of reduced operating ratios—meaning longer trains with fewer staff, and rail safety sacrificed as jobs are cut in favor of overwork or automation.

For major surface transportation projects such as the proposed Union Pacific/Norfolk Southern merger, the public would ordinarily have had multiple opportunities to provide comments at various stages of the National Environmental Policy Act (“NEPA”) environmental review process. That changed with the Board’s decision to waive its rules regarding draft Environmental Impact Statement (“EIS”) publication. We urge the Board to reverse this dangerous decision. Meaningful public comment during the NEPA process can and often does result in substantive improvements to agency decision-making.¹⁴ Without a draft EIS comment opportunity, public engagement will be limited to the very beginning of the environmental review process. The public will not be able to see or help shape the review along the way. As a result, the final EIS will lack critical information about impacts and harms that could have been acquired through better solicitation of local community knowledge, and the Board will risk failure to uphold its responsibility to make a fully-informed decision on this application.

Given the Board’s new and misguided limitations on public engagement—limitations created by waivers improper for a proceeding of such great significance—it has become even more important that the Board ensures meaningful community engagement at the “scoping” stage of review. That requires a thoughtful process to ensure access for those most impacted, as well as transparency in the details of the merger to ensure that those affected can deliver well-informed comments.

¹⁰ Moving Forward Network, *Public Comment to the EPA on Greenhouse Gas Emissions Standards for Heavy-Duty Engines and Vehicles Phase 3 Rule* (June 2023)

https://www.movingforwardnetwork.com/wp-content/uploads/2023/07/MFN_Comments_Rail-and-Locomotive-on-Greenhouse-Gas-Phase-3-Rule-Comment.pdf.

¹¹ See, e.g. U.S. EPA., EPA/600/R-19/188, 2019, *Integrated Science Assessment (ISA) for Particulate Matter* (December 2019); U.S. EPA., EPA/600/R-15/068, 2016, *Integrated Science Assessment (ISA) for Oxides of Nitrogen – Health Criteria* (Jan 2016); Schwartz, Joel et al. *A National Multicity Analysis of the Causal Effect of Local Pollution, NO2, and PM2.5 on Mortality*. *Environmental Health Perspectives* vol. 126, 8 (August 2018), <https://dx.doi.org/10.1289/EHP2732>.

¹² Federal Railroad Administration, HQ-2023-1813, *Accident Investigation Summary Report*, (July 2024), https://railroads.dot.gov/sites/fra.dot.gov/files/2024-07/Accident_Investigation_Summary_Report_HQ-2023-1813_7_19_24.pdf.

¹³ Lunn, R.M., Clemons, M., Blain, R. et al. *Identifying the known and unknown health hazard information for chemical disasters: a phased scoping review of the East Palestine, Ohio train derailment*. *J Expo Sci Environ Epidemiol* 35, 888–906 (September 2025), <https://dx.doi.org/10.1038/s41370-025-00803-0>.

¹⁴ Stava, Ashley, et al. *Quantifying the substantive influence of public comment on United States federal environmental decisions under NEPA*. *Environmental Research Letters* 20.7 (June 2025), <https://dx.doi.org/10.1088/1748-9326/addee5>.

The Board has promised at least twelve in-person public meetings, but has not announced the location for most of them.¹⁵ In deciding the location and structure of its public meetings, we urge the Board to increase the number of public hearings and to prioritize vulnerable frontline and fenceline communities that will be most impacted (and which often have the least access to meaningful input in decision-making processes such as these).

Robust and Just Public Engagement

A robust and just public engagement process is essential to the Board's evaluation of whether the merger is consistent with the public interest—which is, in turn, an essential consideration in the approval process.¹⁶ The Board itself acknowledges that the merger rules put into place after the 1990s “strengthened consideration of the merger’s impacts on communities, employees, shortline railroads, ports, and others.”¹⁷ Full consideration of those impacts cannot be realized without meaningful public engagement with the very communities that those rules are meant to protect.

Communities that are disproportionately burdened by pollution and industrial activity are often excluded from the decision-making processes that shape their environments; and likewise, the necessity of meaningful and inclusive public participation is a matter that has long been recognized under principles of environmental justice.¹⁸ Meaningful participation in those processes goes beyond the opportunity to submit comments; it requires ensuring that the most-impacted communities have a genuine ability to access information, understand the potential consequences of a proposed action, participate in proceedings, and influence agency decision-making. Public participation processes that are rushed, abbreviated, or inaccessible undermine the Board's ability to fully evaluate the impacts of a transaction, most particularly by losing valuable information from those who stand to bear its greatest burdens with the fewest gains.

These concerns are heightened in the context of this proposed rail merger, where the transaction would affect rail operations spanning dozens of states and more than one hundred railyards where neighboring communities may already experience elevated exposure to diesel emissions, freight traffic, noise, and other environmental and public health stressors. As the Board has acknowledged, the merger may have a “significant impact . . . on the quality of the human environment in the affected area.”¹⁹ Because frontline and fenceline communities often have fewer resources to participate in administrative proceedings, procedural fairness demands that the Board take affirmative steps to remove barriers to participation and to ensure that those communities in the affected areas have meaningful opportunities to be heard.

The Board should adopt procedures that maximize accessibility and meaningful participation for impacted communities. Some key elements of such procedures include: (a) collecting robust feedback from all interested groups, while prioritizing access and input from frontline workers and affected communities; (b) coordinating public hearings with local organizations to ensure adequate notice and

¹⁵ STB Finance Docket 36873, “Decision No. 21”, Document ID 53052 at 39 (May 26, 2026).

¹⁶ 49 U.S.C. § 11324(c).

¹⁷ STB Finance Docket 36873, “Decision No. 21”, Document ID 53052 at 18 (May 26, 2026).

¹⁸ First Nat'l People of Color Env't Leadership Summit, *Principles of Environmental Justice* (October 1991), <https://ejnet.org/files/ej/principles.pdf> (demanding “the right to participate as equal partners at every level of decision-making, including needs assessment, planning, implementation, enforcement and evaluation”).

¹⁹ STB Finance Docket 36873, “Decision No. 21”, Document ID 53052 at 9 (May 26, 2026).

accessibility; (c) conducting virtual public hearings that accommodate participants across geographic regions and timezones and give adequate time for oral comments; (d) preparing and providing public access to all written and translated materials ahead of hearings, and ensuring that translation services are available at hearings, to allow for meaningful participation by non-English speaking commenters. By adopting these measures and by restoring the draft EIS comment period, the Board will be better positioned to develop a complete evidentiary record and fulfill its mandate of evaluating whether the merger serves the public interest.

- (a) **Collect robust feedback from all those interested, while prioritizing access and input from frontline workers and affected communities.** Frontline communities and workers possess local knowledge regarding existing conditions and potential impacts that may not be captured through an analysis that lacks their input. This means that the Board needs to hold several in-person and virtual public comment meetings. The Board's commitment to twelve in-person meetings for this transaction is inadequate given the national scope of the merger and the number of communities impacted. There are over one hundred railyards across thirty states that exceed the Board's reporting thresholds for carload activity or truck traffic.²⁰ At minimum, the Board should hold at least one public comment meeting near the most-impacted yards in each affected state: Alabama, Arizona, Arkansas, California, Colorado, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, Missouri, New Jersey, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Virginia, and Washington. Some communities stand out for the sheer scope of projected growth in truck traffic that the applicants' merger would cause nearby; public comment (and place-by-place health studies) are needed there to properly evaluate the public interest and harms of the merger. Those include yard-adjacent communities around Louisville, KY; Inland Empire (near San Bernardino, CA); Oakland, CA; Lathrop, CA; Sharonville, OH; Charlotte, NC; Marion, TN; Austell, GA; Elizabeth, NJ; Detroit, MI; Houston, TX; Chicago, IL; Los Angeles, CA; and Toledo, OH.
- (b) **Coordinate public comment hearings and associated notices and materials with local organizations to ensure adequate community accessibility.** This includes community-based organizations such as community groups, labor unions and organizations, faith-based organizations, and other local partners who often possess longstanding relationships with residents and are best positioned to help disseminate information about the merger and its comment opportunities. Hearings should be widely advertised in local papers, community newsletters, social media platforms, and other forms of communication, in the languages spoken by the impacted communities, to ensure that impacted residents receive timely notice of opportunities to participate in the Board's proceedings. Hearings should be held at accessible locations with public transit access and scheduled in the evenings, outside normal business hours, to maximize worker participation. Individuals providing testimony should be given a minimum of three minutes to speak, not including time needed for language interpretation.
- (c) **Conduct virtual hearings that accommodate participants across geographic regions and time constraints.** The in-person hearings should be supplemented with an extensive schedule of virtual hearings. While not a replacement for in-person hearings, virtual public hearings can significantly expand public participation by eliminating transportation barriers and reducing the time and cost associated with attending in-person meetings. Virtual public hearings should be

²⁰ See 49 C.F.R. § 1105.7(e)(5) for reporting thresholds.

scheduled throughout the public comment period, including at least one meeting near the conclusion of the public comment period to allow for oral commenters that have had as much time as is allowable to synthesize the proposal and prepare a response. Virtual public hearings should be held at times that allow for daytime and evening testimony across time zones. As with in-person hearings, interpretation services should be made available during all virtual hearings, and registration forms should invite participants to identify language needs in advance. Members of the public should have at least two weeks to register for public hearings; those who register to testify should be notified of their assigned hearing block at least three days prior to the hearing so that they can make advance arrangements to be available. If registration is sufficiently high, virtual hearings should be lengthened or even span across multiple days, taking into account that each commenter should have a minimum of three minutes to speak (not including time that may be needed for language interpretation).

- (d) **Prepare and provide public access to all written and translated materials ahead of hearings, and ensure that translation services are available at hearings, to allow for meaningful access for non-English speaking commenters.** Meeting notifications and other documents (e.g., summaries, registration forms) should be translated into languages relevant to the community where a meeting is being held, including (but not limited to) Spanish; documents that contain information in English and another language should clearly state that translated materials are available and where to find them—for example, by including a sentence in Spanish at the beginning of a document stating “Información en español abajo” or “Para información en español, haga clic aquí.” At hearings themselves, interpretation services should be available in languages known to be spoken in the impacted community or languages that are requested by registrants in advance. Guidance for those using interpretation services (for instance, on which audio channel to use) should be shared prior to and at the beginning of each hearing session. For participants who require interpretation, time allotted to speak should be extended appropriately. For instance, a three-minute comment window should be six minutes if interpretation is needed. Interpreters should be provided with instructions and resources to communicate successfully, including a glossary or other reference materials related to the subject matter to improve interpretation accuracy.

Inadequate Environmental and Safety Documentation

Environmental review under NEPA is meant “to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man.”²¹ These goals can only be achieved if the environmental impacts of a proposal are thoroughly understood, both by the reviewing agency and by the public. For the public to engage meaningfully, plans and data must be made available and transparent *before* comment opportunities have passed. One of the documents that can help shape the public’s understanding of relevant issues created by the proposed merger is the Safety Integration Plan (“SIP”). The SIP is meant to provide “detailed,” “step-by-step” descriptions of the measures that will be taken to provide a reasonable assurance of safety at every step of the merger (as well as providing details on the resources that will be allocated to support those measures).²²

²¹ 42 U.S.C. § 4321.

²² 49 C.F.R. § 1106.4; § 244.

These thorough SIP requirements arose after the disastrously bungled merger between Union Pacific and another railroad (Southern Pacific) in the late 1990s.²³ In an audit of that merger (which noted that at least 11 deaths had occurred under the watch of Union Pacific in 1997 alone) the Federal Railroad Administration admonished that “safety issues often become diluted as the merged entity focuses on improving operational efficiency.”²⁴ There is a real risk of this same attitude and outcome playing out again (with one of the same railroads responsible, no less) in the proposed Union Pacific / Norfolk Southern merger.

The applicant railroads have failed to provide the level of detail required of a SIP, both legally and practically, in order for members of the public to meaningfully engage in environmental review. The documents filed thus far do not provide the assurance of safety—far from it. For instance, in the 150-word integration plan for the merged company’s “hours of service” (“HOS”) policy (meant to prevent potentially dangerous worker fatigue),²⁵ the applicants state that they “expect that, as part of the integration process, [Union Pacific and Norfolk Southern] will perform an evaluation of potential HOS plans, including a full review of both companies’ programs, to move toward a single, unified HOS process.”²⁶ They continue that “[f]atigue mitigation policies at both [Union Pacific and Norfolk Southern] will be harmonized to adopt a uniform approach.”²⁷ These are not detailed, step-by-step measures. They are, at best, vague aspirations. Despite the timetable requirement, the applicants lay out no intermediate steps that would support their “expected” end result. Applicants only describe that they “anticipate” (but do not commit to) a wholly unexplained two-year process, at the conclusion of which Norfolk Southern’s dispatchers will have transitioned to Union Pacific’s compliance program. As for the requirement to describe the human and capital resources necessary to carry out this plan, applicants do not appear to offer a response at all.

This vagueness repeats itself in section after section of the SIP. Under regulatory requirements, the SIP is simply incomplete in this regard. The public cannot meaningfully engage with the credibility of these safety plans as written.

Further, many of the claims made in the SIP merit interrogation into the underlying details. For instance, the applicants project that despite the increased yard activity at many railyards under their growth plan, they will be abolishing 6% of their “yard and terminal service” positions while creating no new jobs in that category.²⁸ This puzzling projection is explained in a half-sentence parenthetical which says that the cuts will be possible “due to efficiencies from implementing [Union Pacific’s] Terminal Command Center technology” (a term that appears nowhere else in the document).²⁹

²³ Federal Railroad Administration, *Federal Railroad Administration Issues Final Rule Regarding Safety Integration Planning for Future Railroad Consolidations* (March 2002), <https://railroads.dot.gov/elibrary/federal-railroad-administration-issues-final-rule-regarding-safety-integration-planning> (“The rulemaking was initiated in response to . . . systemic safety deficiencies related to large-scale railroad mergers that took place in the mid-1990’s involving the Union Pacific and Southern Pacific as well as the Burlington Northern and Atchison Topeka & Santa Fe.”).

²⁴ Federal Railroad Administration, *Union Pacific Railroad Safety Assurance and Compliance Program Report of Findings and Recommendations*, (February 1998), <https://railroads.dot.gov/elibrary/union-pacific-railroad-safety-assurance-and-compliance-program-report>.

²⁵ STB Finance Docket 36873, “Safety Integration Plan”, Document ID 34238 at 91 (April 30, 2026).

²⁶ Id.

²⁷ Id.

²⁸ Id. at 154.

²⁹ Id. at 155.

Outside of a more detailed SIP, meaningful public comment would be supported by greater disclosure of environmental data more broadly. For example, the application in several places cites a worksheet titled “Railroad Emission Data Inventory.xlsx”.³⁰ However, this data inventory does not appear to be publicly available, so the public must take emissions claims on faith. Nor does the public have access to yard-by-yard inventory information (e.g., tiers of switcher locomotives in use at each yard) that would assist in meaningful public engagement on emissions impacts from the proposed merger. This lack of information clouds both the applicants’ climate claims and the community-specific health interests that are implicated by local pollutant emissions. Similarly, the credibility of Union Pacific and Norfolk Southern’s long-haul truck diversion estimates is questionable at best without far more detail in the underlying data and assumptions than the public can currently access. In other merger proposals, railroads have vastly overestimated the number of long-haul trucks that would be removed from the roads after merging. In 2023, the Board stated that approval of the Canadian Pacific Railway / Kansas City Southern merger would “attract 64,000 truckloads from the roads to rail each year.”³¹ As of this year, those projections have not come close to being realized per the merged railroad’s own data.³²

This letter is not intended to provide exhaustive critiques of the SIP or exhaustive expectations of environmental documentation. Rather, it is meant to emphasize the dangers of limiting the NEPA process’s public comment opportunities—arising largely from the Board’s decision to skip a draft EIS—when there are so many unresolved questions in the publicly available record on this matter. The applicants have not met their burden of detail. The burden, therefore, has shifted onto the public, who must guess at the companies’ plans (without seeing a draft) and weigh in on their potential human and environmental impacts.

Closing

The proposed Union Pacific/Norfolk Southern merger would reshape the U.S. freight landscape at both the national and local levels, granting more concentrated, largely unregulated power to an already privatized industry with oversized decision-making authority. Acknowledging the likelihood of significant health and environmental impacts, the Board has already determined that preparation of an EIS is necessary for this proceeding. But for an EIS to be successful, the lead agency must ensure the public has a meaningful opportunity to engage. To advance this goal, we call on the Board to restore the draft EIS comment period. We further call on the Board to ensure that public hearings are designed to maximize meaningful participation by the impacted communities, who often have the fewest resources to participate in decision-making. And finally, we call on the Board to ensure that the public has access to transparent and detailed environmental documentation during this process, including but not limited to a SIP that meets the regulatory requirements for detail, place-by-place health studies in yards exceeding activity reporting thresholds, all data underlying emissions calculations, and yard inventories. Meaningful public input is critical to ensuring that the Board is able to make an informed decision; an uninformed decision on a matter this significant will result in generational harm to the health and safety of the public at large and workers.

³⁰ See, e.g., STB Finance Docket 36873, “Amended Application”, Document ID 311221 at Vol. 1, page 641, note 4.

³¹ STB, No. 22-07, *STB Approves CP/KCS Merger With Conditions and Extended Oversight Period* (March 2023), <https://www.stb.gov/news-communications/latest-news/pr-23-07/>.

³² STB Finance Docket 36500 Sub-No. 6, *Canadian Pacific Railway Limited, et al. – Control – Kansas City Southern, et al.*, “CPKC’s January 2026 Traffic Diversion Submission”, Document ID 310742 (January 2026).

For any questions or to discuss how to best implement a meaningful public comment process, please contact Molly Greenberg at greenberg@movingforwardnetwork.org.

Sincerely,

Bayou City Waterkeeper

Beaver County Marcellus Awareness Community (BCMAC)

Breathe Project

Center for Earth Energy & Democracy (CEED)

Central California Asthma Collaborative

Natalia Ospina
Center on Race, Poverty & the Environment

Climate Reality: Pittsburgh & Southwestern PA Chapter

Paulina Lopez
Duwamish River Community Coalition

Environmental Justice Health Alliance for Chemical Policy Reform (EJHA)

Lucy Contreras
GreenLatinos

Jasmine Gil
Hip Hop Caucus

Illinois Environmental Council

Labor Network for Sustainability

League of Conservation Voters (LCV)

Melanie Minuche, Transportation and Mobility Justice Team
Little Village Environmental Justice Organization /

Ramsey Sprague, President
Mobile Environmental Justice Action Coalition

Ashley Funk, Executive Director
Mountain Watershed Association

Molly Greenberg
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Robert Blake
Native Sun

Natural Resources Defense Council

New Jersey Environmental Justice Alliance

Jerry Rivers

North American Climate, Conservation and Environment (NACCE)

Altorice Frazier

Pacific Environment

Physicians for Responsibility Pennsylvania

PODER

Gillian Graber, Executive Director

Protect PT (Penn-Trafford)

Public Rail Now

Rail Pollution Protection Pittsburgh (RP3)

Jess Conard, Founder/Executive Director

Rail Watch

Railroad Workers United

RiSE4EJ

Sherry Baily, Barstow Resident

Katherine García, Clean Transportation for All Campaign Director

Sierra Club

Bill Moyer, Executive Director

Solutionary Rail

Kim Gaddy

South Ward Environmental Alliance

Michelle Pinon, US Coordinator

Stand.earth

Texas Environmental Justice Advocacy Services

Three Rivers Waterkeeper

The United Electrical, Radio and Machine Workers of America

Hallcon Rail Transport United Electrical Local 1077

Rudolph Ward

Jaime Valencia
Wanda Ivey
Spring Daniels

Warehouse Workers for Justice

Theral Golden
West Long Beach Association

Nicole Merino Tsui, Director of Strategic Partnerships
West Oakland Environmental Indicators Project

Certificate of Service

I certify that on Tuesday, 7/27/2026, I served a copy of this document by electronic mail upon all parties of record in this proceeding.

/s/ Molly Greenberg
Molly Greenberg