



Gulf & Ohio Railways, Inc.

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ENTERED
Office of Chief Counsel
August 21, 2026
Part of
Public Record

August 21, 2026

VIA E-FILING

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, SW
Washington DC 20423-0001

Re: Union Pacific Corporation and Union Pacific Railroad Company - Control -
Norfolk Southern Corporation and Norfolk Southern Railway Company, FD
36873

Dear Chief of Case Administration:

Pursuant to Decision No. 30 in Docket No. FD 36873, the Board removed the merger proceedings from abeyance; adopted a procedural schedule; directed the production of certain material; and ruled on a pending procedural request.

Consistent with the proposed procedural schedule, Gulf & Ohio Railways, Inc. ("G&O"), on behalf of itself and its operating railroad subsidiaries, hereby files this Notice of Intent to Participate as a Party of Record in this proceeding.

G&O is a railroad holding company whose operating railroad subsidiaries include Knoxville & Holston River Railroad Co., Inc.; Lancaster & Chester Railroad, LLC; Laurinburg & Southern Railroad Co., Inc.; and Piedmont & Atlantic Railroad Co., Inc. d/b/a Yadkin Valley Railroad. Collectively, these entities are referred to herein collectively as "G&O."

G&O and its affiliated short line railroads provide freight rail transportation services and interchange traffic with Class I rail carriers, including carriers that may be affected directly or indirectly by the proposed transaction. Accordingly, G&O has a direct and substantial interest in the Board's consideration of the Application and wishes to participate as a Party of Record for purposes of receiving filings, monitoring the proceeding, and submitting comments, requests for conditions, or other pleadings as determined necessary.

G&O's operating railroads rely upon efficient and competitive interchange arrangements with Class I carriers to provide freight transportation service to customers throughout the Southeast and beyond. As a holding company for several short line railroads that originate, terminate, and interchange traffic with connecting carriers, G&O has a substantial interest in ensuring that any approved merger preserves and enhances reasonable interchange access, competitive routing opportunities, service reliability, car supply, switching practices, and the ability of short line railroads and their customers to obtain efficient connections to the national rail network. G&O therefore intends to monitor and evaluate the proposed transaction's potential effects on short line carriers, interchange gateways, competitive access, and freight shippers

served by its railroads, and reserves the right to seek appropriate conditions or other relief as may be warranted by the record developed in this proceeding.

Please serve all filings and correspondence in this proceeding upon:

Wm. Gregory Hall, Jr.
General Counsel, Secretary & Treasurer
Gulf & Ohio Railways, Inc.
422 West Cumberland Avenue
Knoxville, Tennessee 37902
Email: acp@gulfandohio.com

The filing includes a Certificate of Service reflecting service upon the Secretary of Transportation, the Attorney General of the United States, counsel for Union Pacific Corporation and Union Pacific Railroad Company, and counsel for Norfolk Southern Corporation and Norfolk Southern Railway Company and all Parties of Record. Please contact the undersigned if any additional information is required.

Respectfully submitted,

/s/ Wm. Gregory Hall, Jr.

Wm. Gregory Hall, Jr.
General Counsel, Secretary & Treasurer
Gulf & Ohio Railways, Inc.

CERTIFICATE OF SERVICE

I, Wm. Gregory Hall, Jr., hereby certify that on this 21st day of August 2026, I caused a copy of the foregoing Notice of Intent to Participate of Gulf & Ohio Railways, Inc. and its Operating Railroad Subsidiaries to be served by electronic mail where available and/or by first-class mail or other means authorized by the Surface Transportation Board upon all Parties of Record and the following additional designated recipients:

Required Recipient	Service Address / Representative
Secretary of Transportation	The Honorable Sean P. Duffy Secretary of Transportation U.S. Department of Transportation 1200 New Jersey Avenue, S.E. Washington, DC 20590
Attorney General of the United States	The Honorable Pam Bondi Attorney General of the United States c/o Assistant Attorney General, Antitrust Division Room 3109 U.S. Department of Justice Washington, DC 20530
Counsel for Union Pacific Corporation and Union Pacific Railroad Company	Michael L. Rosenthal Covington & Burling LLP One CityCenter 850 Tenth Street, N.W. Washington, DC 20001
Counsel for Norfolk Southern Corporation and Norfolk Southern Railway Company	Raymond A. Atkins Sidley Austin LLP 1501 K Street, N.W. Washington, DC 20005

/s/ Wm. Gregory Hall, Jr.

Wm. Gregory Hall, Jr.
General Counsel, Secretary & Treasurer
Gulf & Ohio Railways, Inc.