

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

ENTERED
Office of Chief Counsel
August 24, 2026
Part of
Public Record

August 4, 2025

Re: Waybill Request WB25-42 FD 36873

I have approved the addition of the following individual to the waybill access letter in WB25-42.

- a. Laura Flahive Wu – Covington & Burling LLP
- b. Kevin Kelly – Covington & Burling LLP
- c. Joshua González – Covington & Burling LLP
- d. Daniel Damitio – Covington & Burling LLP
- e. Molly Brown – Covington & Burling LLP
- f. Charlotte Krovoza – Covington & Burling LLP
- g. Caroline Harrison – Covington & Burling LLP
- h. Travis Cabbell – Covington & Burling LLP
- i. Kimberly Greene – Covington & Burling LLP
- j. Peter Whitfield – Sidley Austin LLP
- k. Brooklyn Hildebrandt – Sidley Austin LLP
- l. Avery Gerdes – Sidley Austin LLP
- m. Charles Beauregard – Sidley Austin LLP
- n. Kaseir Archie – Sidley Austin LLP
- o. Naila Scott – Sidley Austin LLP
- p. Summer Boyd – Sidley Austin LLP
- q. William Mullins – Mullins Law Group PLLC
- r. John Edwards – Mullins Law Group PLLC
- s. Crystal Zorbaugh – Mullins Law Group PLLC
- t. Spencer Naake – Mullins Law Group PLLC
- u. Shuang Wang – Charles River Associates
- v. Ian Fillmore – Charles River Associates
- w. Powell Dixon – Charles River Associates
- x. Diana Saenz – Charles River Associates
- y. Charlotte Zhou – Charles River Associates
- z. Minh Nguyen – Charles River Associates
- aa. Masha Melkonyan – Charles River Associates
- bb. Minghao Li – Charles River Associates
- cc. Aaron Moniz – Oliver Wyman
- dd. Alex Tsyplakov – Oliver Wyman
- ee. Yihao Yang – Oliver Wyman
- ff. Jon Orr – Oliver Wyman
- gg. Jonathan Epstein – Econic Partners, LLC
- hh. 8. Jaewon Lee – Econic Partners, LLC
- ii. 9. Ka Hei Tse – Econic Partners, LLC
- jj. 10. Mwangangi Kalii – Econic Partners, LLC

Prior payment of processing and mailing cost of **\$2592** (\$72 per signature) is required and received.

Sincerely,

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.

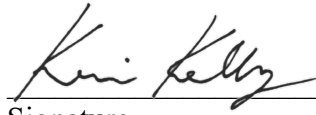
By: Laura Flahive Wu



Signature

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By: Kevin Kelly

A handwritten signature in cursive script, appearing to read "Kevin Kelly", written over a horizontal line.

Signature

Waybill Agreement WB25-42

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By: Joshua González



Signature

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By: Daniel Damitio

Daniel Damitio

Signature

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By: Charlotte Krovoza.

Charlotte Krovoza

Signature

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By: Caroline Harrison

Caroline Harrison

Signature

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By: Travis Cabbell

Travis Cabbell

Signature

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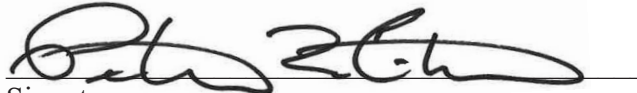
By: Kimberly Greene

Kimberly Greene

Signature

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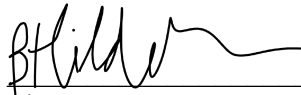
By: Peter Whitfield



Signature

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By: Brooklyn Hildebrandt

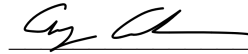
A handwritten signature in black ink, appearing to read 'B. Hildebrandt', written over a horizontal line.

Signature

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By: Avery Gerdes

A handwritten signature in black ink, appearing to read 'A. Gerdes', is written over a horizontal line.

Signature

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By: Charles Beauregard

A handwritten signature in black ink, appearing to be 'CB' followed by a horizontal line.

Signature

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By: Kaseir Archie

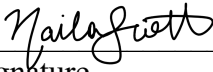
Kaseir Archie

Signature

Waybill Agreement WB25-42

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By: Naila Scott

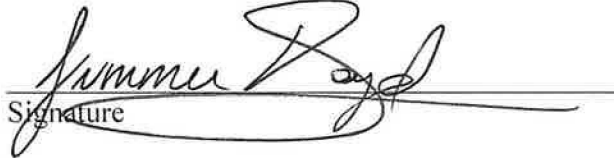


Signature

Waybill Agreement WB25-42

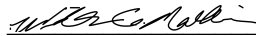
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By: Summer Boyd


Signature

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By: William Mullins



Signature

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By: John Edwards

John Edwards

Signature

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By: Crystal Zorbaugh



Crystal Zorbaugh (Aug 5, 2026 19:46:55 EDT)

Signature

Waybill Agreement WB25-42

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By: Spencer Naake



Spencer Naake (Aug 5, 2026 11:45:13 PDT)

Signature

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By: Shuang Wang

Shuang Wang

Signature

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By: Ian Fillmore

Ian Fillmore

Signature

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By: Powell Dixon

Powell T Dixon

Signature

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By: Diana Saenz

Diana T. Saenz
Signature

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By: Charlotte Zhou

Charlotte Zhou

Signature

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By: Minh Nguyen

Minh Nguyen

Signature

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By: Masha Melkonyan

MM

Signature

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By: Minghao Li

Minghao Li

Signature

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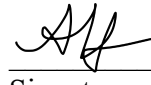
By: Aaron Moniz



Signature

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By: Alex Tsyplakov

 A. Tsyplakov
Signature

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By: Yihao Yang



Signature

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By: Jon Orr

Signature Jonathan Orr

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By: Jonathan Epstein

A handwritten signature in black ink, appearing to be 'Jonathan Epstein', written above a horizontal line.

Signature

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By: Jaewon Lee

이재원

Signature

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By: Ka Hei Tse

Ka Hei Tse

Signature

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By: Mwangangi Kalii

Mwangangi Kalii

Signature

COVINGTON

BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
JOHANNESBURG LONDON LOS ANGELES NEW YORK
PALO ALTO SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

Michael L. Rosenthal

Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 5448
mrosenthal@cov.com

By Email

July 30, 2026

Martin Schlenker
Acting Director, Office of Economics
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423
waybill@stb.gov

**Re: Request for Waybill Data Access Renewal, WB25-42,
Docket No. FD 36873, *Union Pacific Corporation, et al.*—
*Control—Norfolk Southern Corporation, et al.***

Dear Mr. Schlenker:

I write on behalf of Applicants Union Pacific and Norfolk Southern¹ in connection with the above-referenced proceeding. Pursuant to 49 C.F.R. § 1244.9(b)(4), I am respectfully requesting an extension of access to the confidential Carload Waybill Sample (“CCWS”) in WB25-42.

Access to the unmasked 2019-2024 CCWSs for all commodities (including all records, all fields, and confidential unmasked revenues) was approved on August 4, 2025, in WB25-42 until August 31, 2026.

The purpose of this request is to allow Applicants’ outside counsel and consultants to continue to evaluate relevant issues as the proceeding is still pending. Access is being requested for the following outside counsel and consultants:

1. Selected personnel of Covington & Burling LLP (See Attachment A)
2. Selected personnel of Sidley Austin LLP (See Attachment B)
3. Selected personnel of Mullins Law Group PLLC (See Attachment C)
4. Selected personnel of Charles River Associates (See Attachment D)

¹ “Applicants” are Union Pacific Corporation (“UPC”) and Union Pacific Railroad Company (“UP”) (collectively, “Union Pacific”) and Norfolk Southern Corporation (“NSC”) and Norfolk Southern Railway Company (“NS”) (collectively, “Norfolk Southern”).

COVINGTON

July 30, 2026
Page 2

5. Selected personnel of Oliver Wyman (See Attachment E)
6. Selected personnel of Econic Partners, LLC (See Attachment F)
7. Selected personnel of Analysis Group (See Attachment G)

If additional outside counsel or consultants require access, we will amend our request to add such individuals.

I will be submitting payment of \$5,816 to the STB's electronic payment system at pay.gov, reflecting the fixed fee of \$200 plus \$72 per person for each individual (a total of 78 outside counsel and consultants). 49 C.F.R. § 1002.2(f)(98)(i).

Please do not hesitate to contact me at (202) 662-5448 if you have any questions regarding this request.

Sincerely,

Michael L. Rosenthal
*Counsel for Union Pacific
Railroad Company*

cc: Raymond A. Atkins, Counsel for Norfolk Southern Railway Company

Attachments

ATTACHMENT A

Selected Personnel of Covington & Burling LLP

1. Michael Rosenthal
2. Derek Ludwin
3. James O'Connell
4. Laura Flahive Wu
5. Thomas Brugato
6. Kevin Kelly
7. Joshua González
8. Pegah Nabili
9. Wentao Yang
10. Matthew J. Glover
11. Daniel Damitio
12. Molly Brown
13. Charlotte Krovoza
14. Caroline Harrison
15. Travis Cabbell
16. Kimberly Greene

ATTACHMENT B

Selected Personnel of Sidley Austin LLP

1. Raymond A. Atkins
2. Matthew Warren
3. Carrie Mahan
4. Allison Davis
5. Marc Korman
6. Stephen Laudone
7. Nicole Booth
8. Peter Whitfield
9. Brooklyn Hildebrandt
10. Avery Gerdes
11. Charles Beauregard
12. Kaseir Archie
13. Naila Scott
14. Summer Boyd

ATTACHMENT C

Selected Personnel of Mullins Law Group PLLC

1. William Mullins
2. John Edwards
3. Crystal Zorbaugh
4. Spencer Naake

ATTACHMENT D

Selected Personnel of Charles River Associates

1. Elizabeth Bailey
2. Nadia Soboleva
3. Josh Sherman
4. Alex Arsenault
5. Colin Grimes
6. Pedro Degiovanni
7. Lang Xuan Luo
8. Shuxin Wang
9. Shuang Wang
10. Ian Fillmore
11. Powell Dixon
12. Diana Saenz
13. Charlotte Zhou
14. Minh Nguen
15. Masha Melkonyan
16. Minghao Li

ATTACHMENT E

Selected Personnel of Oliver Wyman

1. Adriene Bailey
2. David Hunt
3. Yury Gorbunov
4. Michael Koehler
5. Daniel Spiller
6. Simon Roberts
7. Jason Kuehn
8. Marc Meketon
9. Bhakti Vaidya
10. Sarojini Davis
11. Erick Wikum
12. Aaron Moniz
13. Alex Tsyplakov
14. Yihao Yang
15. Jon Orr

ATTACHMENT F

Selected Personnel of Econic Partners, LLC

1. Mark Israel
2. Catherine Barron
3. Steven Peterson
4. Georgi Giozov
5. Meade Atkeson
6. Alexander Collison
7. Jonathan Epstein
8. Jaewon Lee
9. Ka Hei Tse
10. Mwangangi Kalii

ATTACHMENT G

Selected Personnel of Analysis Group

1. Divya Mathur
2. Ann Murray
3. Hyun Lee