

312147

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

ENTERED
Office of Chief Counsel
August 31, 2026
Part of
Public Record

August 26, 2026

Re: Waybill Request WB26-35

I have approved the addition of the following individuals to the waybill access letter in WB26-35.

- a) John Buchanan - Oliver Wyman
- b) Morgan Harris - Oliver Wyman
- c) Alison Hole - Charles River Associates
- d) Leah Cao - Charles River Associates

Prior payment of processing and mailing cost of **\$288** (\$72 per signature) is required and received.

Sincerely,

MARTIN
SCHLENKER

Digitally signed by
MARTIN SCHLENKER
Date: 2026.08.26
15:02:30 -04'00'

Martin Schlenker
Director
Office of Economics

Waybill Agreement WB26-35

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: John Buchanan



Signature

Waybill Agreement WB26-35

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: Morgan Harris

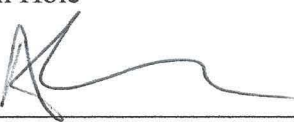


Signature

Waybill Agreement WB26-35

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: Alison Hole



Signature

Waybill Agreement WB26-35

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: Leah Cao

Leah Cao

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

August 26, 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 Additional Waybill Data Access, WB26-35,
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 additional access to the confidential Carload Waybill Sample (“CCWS”) in WB26-35 for the following individuals:

1. John Buchanan of Oliver Wyman
2. Morgan Harris of Oliver Wyman
3. Alison Hole of Charles River Associates
4. Leah Cao of Charles River Associates

I will be submitting payment of \$288 to the STB’s electronic payment system at pay.gov, reflecting the \$72 fee per person (for a total of 2 outside 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.

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

August 26, 2026
Page 2

Sincerely,

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

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