



ENTERED
Office of Chief Counsel
September 1, 2026
Part of
Public Record

Submitted: September 1, 2026

ATTN: SURFACE TRANSPORTATION BOARD

**RE: UNION PACIFIC CORPORATION AND UNION PACIFIC RAILROAD COMPANY—CONTROL—
NORFOLK SOUTHERN CORPORATION AND NORFOLK SOUTHERN RAILWAY COMPANY**

Docket No. FD 36873

NOTICE OF INTENT TO PARTICIPATE

Genesee Valley Transportation (a holding company consisting of 4 - Class III railroads) serving customers and communities across NY and Northeastern PA, hereby submits this Notice of Intent to Participate in the above-captioned proceeding pursuant to the Surface Transportation Board's August 18, 2026 decision establishing the procedural schedule for consideration of the revised application submitted by Union Pacific Corporation, Union Pacific Railroad Company, Norfolk Southern Corporation, and Norfolk Southern Railway Company (collectively, the "Applicants").

Genesee Valley Transportation intends to participate as a **Party of Record** in this proceeding because the proposed transaction has the potential to materially affect the competitive environment in which short line railroads operate, including the availability, terms, and reliability of interchange with Class I railroads.

Genesee Valley Transportation, the Depew, Lancaster & Western RR (**DLWR**) and the Delaware-Lackawanna RR (**DL**) depend upon effective interchange relationships with Class I railroads to provide competitive and efficient transportation service to its customers and to connect the communities and industries it serves to national and regional rail networks. The proposed combination of Union Pacific and Norfolk Southern would create a single Class I railroad with a substantially expanded geographic footprint and control over important gateways, routes, facilities, and interchange opportunities.

Genesee Valley Transportation, the Depew, Lancaster & Western RR (DLWR) and the Delaware-Lackawanna RR (DL) have a direct interest in ensuring that the proposed transaction does not impair competitive access to rail transportation or otherwise disadvantage short line carriers through changes in interchange practices, routing options, service levels, rates, terms, conditions, or access to competitive Class I connections.

In particular, Genesee Valley Transportation, the Depew, Lancaster & Western RR (DLWR) and the Delaware-Lackawanna RR (DL) are concerned that the transaction could alter the competitive balance among Class I railroads and affect the ability of short line carriers to maintain commercially meaningful interchange alternatives. The transaction may also affect the availability and reliability of interchange routes and gateways, including the ability of short lines and their customers to obtain efficient access to competing Class I networks.

THE GVT RAIL SYSTEM

"the" Delaware-Lackawanna RR Co., Inc. – Depew, Lancaster & Western RR Co., Inc. – Falls Road RR Co., Inc.
Lowville & Beaver River RR Co., Inc. – Mohawk, Adirondack & Northern RR Co., Inc.

"Friendly, customized service"

GENESEE VALLEY TRANSPORTATION CO., INC. – GVT RAIL SYSTEM

Genesee Valley Transportation therefore intends to participate in the Board's review of the proposed transaction and, as appropriate, will submit evidence, comments, protests, requests for conditions, and other argument addressing the competitive and operational effects of the proposed merger. Genesee Valley Transportation particularly expects to evaluate whether conditions are necessary to preserve competitive interchange opportunities, prevent discriminatory or unreasonable interchange practices, and protect the ability of short line railroads and their customers to obtain effective access to competing rail networks.

Nothing in this Notice should be construed as stating the full extent of Genesee Valley Transportation's concerns, evidence, or requested relief. Genesee Valley Transportation expressly reserves the right to supplement its position as additional information becomes available through the Board's proceeding and discovery process.

Accordingly, Genesee Valley Transportation respectfully requests that the Board recognize it as a **Party of Record** in Docket No. FD 36873 and serve it with all filings, decisions, notices, and other documents served upon parties of record in this proceeding.

Respectfully submitted,

By: Matt Wasilewski
VP - Sales & Business Development
[Genesee Valley Transportation - GVT Rail](#)
1 Mill Street - Batavia, New York 14020
Mobile - 716.512.3199
Office - 585.343.5398
mdw@gvtrail.com





GENESEE VALLEY TRANSPORTATION CO., INC.

1 Mill Street Suite 101, Batavia, NY 14020 - Tel. 585.343.5398 - E-Mail: contact@gvtrail.com

1 September 2026

CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing *Notice of Intent to Participate* to be served electronically on the Secretary of Transportation, the Attorney General of the United States, and Applicants' representatives.

Matt Wasilewski

VP - Sales & Business Development

[Genesee Valley Transportation](#) - [GVT Rail](#)

1 Mill Street - Batavia, New York 14020

Mobile - 716.512.3199

Office - 585.343.5398

mdw@gvtrail.com

THE GVT RAIL SYSTEM

"the" Delaware-Lackawanna RR Co., Inc. – Depew, Lancaster & Western RR Co., Inc. – Falls Road RR Co., Inc.
Lowville & Beaver River RR Co., Inc. – Mohawk, Adirondack & Northern RR Co., Inc.

"Friendly, customized service"