

ENTERED
Office of Chief Counsel
September 9, 2026
Part of
Public Record

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

FINANCE DOCKET NO. 36873

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

**VIRGINIA PORT AUTHORITY'S AND VIRGINIA INTERNATIONAL
TERMINALS, LLC'S DESCRIPTION OF ANTICIPATED RESPONSIVE
APPLICATION**

Dated: September 9, 2026

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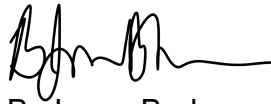
**VIRGINIA PORT AUTHORITY’S AND VIRGINIA INTERNATIONAL
TERMINALS, LLC’S DESCRIPTION OF ANTICIPATED RESPONSIVE
APPLICATION**

The Virginia Port Authority (“VPA”), a political subdivision of the Commonwealth of Virginia, and Virginia International Terminals, LLC (“VIT”), VPA’s wholly-owned marine terminal operating subsidiary, submit this description of anticipated responsive application in accordance with the Board’s order of August 18, 2026, that set the procedural schedule in this matter. Decision No. 53195.

To redress competitive harm and to enhance competition at VPA-owned and VIT-operated marine terminals, VPA and VIT anticipate filing responsive application(s) to seek, in the event the transaction is approved, (1) the approval of a sale to VPA of track located outside Norfolk International Terminals (“NIT”) that is owned by Norfolk Southern Corporation and/or Norfolk Southern Railway Company (collectively, “NS”) or Norfolk & Portsmouth Beltline (“NPBL”), including the tracks and underlying land, and the Quarter

Master Junction Switch, thereby enabling VIT, rather than NS or NPBL, to exercise exclusive control over traffic flow into and out of both ends of NIT as a neutral party, (2) the approval of a grant of trackage rights by NS, NPBL, or both, to CSX for access to NIT; (3) appointment of an independent VPA representative to the NPBL Board of Directors; (4) such other applications as may be necessary to provide CSX equal access to facilities at the Port of Virginia; or (5) any combination of the foregoing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'B. Jason Barlow', with a stylized, cursive script.

B. Jason Barlow
Chief Administrative Officer
Virginia Port Authority
101 W. Main Street, Ste 600
Norfolk, VA 23510
Tel: (757) 683-8000
Email: jbarlow@portofvirginia.com

Dated: September 9, 2026

CERTIFICATE OF SERVICE

I certify that, on September 9, 2026, I have caused to be served a copy of the foregoing upon the Parties of Record in these proceedings.

A handwritten signature in black ink, appearing to read 'B. Jason Barlow', with a stylized, cursive script.

B. Jason Barlow
Chief Administrative Officer
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