

**Before the
SURFACE TRANSPORTATION BOARD**

STB Docket No. FD 36873

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

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

**DESCRIPTION OF ANTICIPATED RESPONSIVE APPLICATION BY
GEORGIA SOUTHWESTERN RAILROAD, INC.**

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September 9, 2026

*Counsel for Georgia Southwestern
Railroad, Inc.*

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GEORGIA SOUTHWESTERN RAILROAD, INC.**

In accordance with the Board’s Decision No. 30 served in this proceeding on August 18, 2026, Georgia Southwestern Railroad, Inc. (“GSWR”) submits this Description of Anticipated Responsive Application.

Background

GSWR is a Class III railroad that operates over 212 miles of track in Alabama and Georgia. As relevant to the Proposed Transaction, GSWR interchanges with Norfolk Southern Railway Company (“NS”) in Albany and Columbus, GA.

If the Board does approve the Proposed Transaction, GSWR anticipates that it will be seeking as a condition to the Board’s approval, the acquisition of the following described rights that would require a responsive application, to insulate GSWR and its customers from any potential negative impacts of the Proposed Transaction.

Description of Anticipated GSWR Trackage Rights Request

Trackage rights over NS between Smithville, GA and Americus, GA, including the right of GSWR to interchange with Heart of Georgia Railroad, Inc. in Americus.

Additional Conditions and Relief

The above description of anticipated responsive application is presented in response to the abbreviated schedule provided by the Board. As the record in this proceeding develops, GSRW may elect not to seek a responsive application, and may seek as relief additional conditions, whether or not requiring a responsive application, in its comments and requests for conditions scheduled to be filed November 18, 2026 in accordance with the procedural schedule, or as the Board may modify the procedural schedule in the future.

Respectfully submitted,



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Counsel for Georgia Southwestern Railroad, Inc.

Dated: September 9, 2026

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of September 2026, the foregoing document was served by first-class mail or email upon all parties of record on the service list and the ALJ in this proceeding.



Justin J. Marks