

Daniel A. (Alex) Nagel

Retired, Revenue Accounting Senior "C" – Canadian Pacific Kansas City

Member – Board of Directors – All Aboard Minnesota

2813 67th Lane North

Brooklyn Center, MN 55430

alexlarams@earthlink.net

(612) 670-8548 (cell)

(763) 566-7353 (landline)

9-15-26

312356

ENTERED

Office of Chief Counsel

September 16, 2026

Part of
Public Record

BEFORE THE U.S. SURFACE TRANSPORTATION BOARD

WASHINGTON, DC

Docket No. FD 36873

UNION PACIFIC CORPORATION – CONTROL – NORFOLK SOUTHERN CORPORATION

SECOND LETTER OF COMMENT OF DANIEL A. (ALEX) NAGEL

U.S. Surface Transportation Board

395 E Street SW

Washington, DC 20423

Re: Docket No. 36873 – Second Letter of Comment

Union Pacific Corporation – Control – Norfolk Southern Corp

Dear Members of the Board,

I would like to respectfully submit this Second Letter of Comment in Docket No. FD 36873 concerning the Applicants' Second Response to Decision No. 21 in STB Docket No. FD 36873 that was submitted to the Board on 7-27-26 to answer the Board's own supplemental information mandate. I am an experienced railroad professional who retired on 8-1-25 after a 32-year career with CPRS/CPKC (1995-2025) and IAIS (1987-89). In addition to being an avid and dedicated student of the railroad industry since my youth, I have also been active in membership roles with the Minnesota Freight Advisory Committee and am in the beginning stages of starting my own freelance railroad consulting business. I was also elected to the Board of Directors at All Aboard Minnesota; a passenger rail advocacy group in the summer of 2025 where I not only handle treasury duties but also provide a wealth of knowledge of the industry and its practices and operations that can have an impact on current passenger train operations not only in Minnesota but the upper Midwest as well. I am also active in a number of other rail-related projects and participate regularly in industry-related conferences and webinars to stay abreast of the latest trends and developments within the industry. I am a 1993 graduate of the University of Iowa with a degree in General Studies with an emphasis in Marketing and Transportation. The views expressed in this letter are strictly my own.

From reviewing the material submitted by the Applicants in answer to the nine points the Board outlined in Decision No. 21 of this docket, it remains apparent as ever that Applicants fail to offer real and genuine remedies to shippers and receivers who could be irreparably harmed by the proposed transaction if it was to be approved by the Board. Indeed, one of the primary considerations of the 2001 Merger Rules that STD adopted was not whether true competition would be merely preserved but rather would it be **enhanced** by a combination that the Applicants are proposing here. From reviewing the material submitted by the Applicants on 7-27-26, I would strenuously argue that true competition would be irreparably damaged on a number of fronts if the proposed transaction were to be approved by the members of the Board. Much of the material submitted by the Applicants actually seems to shift the burden to shippers and customers as well as regulators in a very clever and clandestine way and the remedies that the Applicants propose to mitigate these concerns not only lack substance but are also temporary as well. Given some of the developments that have taken place since the Board placed this proceeding in abeyance back in late May 2026 and material submitted by Applicants on 7-27-26, I would like to review the areas where I have the greatest concerns.

Gateway Protection/Committed Gateway Pricing & 3:2-2:1 Considerations

Without question, one of the biggest concerns for shippers and customers who rely on rail transportation are related to gateway protection/pricing and the reduction of competitive options should the proposed transaction submitted by the Applicants be approved. The primary gateways where UP and NS meet are Chicago, St Louis, Kansas City, Memphis and New Orleans. In order to meet the concerns of shippers and customers on BNSF and CSXT origins and destinations, the Applicants have introduced Committed Gateway Pricing (CGP). To their credit, the Applicants also substantially increased the number of commodities covered including bulk unit train traffic. At first glance, all of this looks impressive and a genuinely workable solution for customers and shippers on BNSF and CSXT origin and destination points. However, a closer look at the CGP program being offered by Applicants per the Second Response reveals that this program is only a temporary fix to the issues that will face customers and shippers and actually expires once the Board's oversight period ends. In its most basic form, this program would come into play whereby a shipment that would originate in the West on UP that is destined for a receiver in the East. At the moment, the shipper would typically have two routing options regardless of what gateway he received the most favorable rate quote on (save for KCITY): UP – NS or UP – CSXT. However, the situation changes dramatically should the proposed UP-NS transaction be approved by the Board. While the gateway(s) are still there for either CSXT or BNSF, the real issue is if those options are still going to be commercially viable for the shipper/customer. Why is this? Because the reality is that a merged railroad such as UP-NS now has the ability to control not only the origination point in the West but now they also control the destination point in the East as well. Consequently, a combined UP-NS

will naturally price such a shipment for its own long haul. There would be no incentive whatsoever to include a competing road (CSXT or BNSF) at any of these listed gateways where they would short haul themselves. And even if the shipment is destined for a receiver in the East on CSXT at, say, Hagerstown, MD as an example, a combined UP-NS would be inclined to give the affected car to CSXT at the Pittsburgh gateway; effectively contracting CSXT participation and revenue capture.

Another concern in this area are shippers and customers who would see their competitive options shrink from either 2-to-1 or 3-to-2 if the proposed UP-NS transaction is approved by the Board. In the proposed transaction submitted by the Applicants, there are areas where shippers and customers will see their competitive options reduced from two railroads to one railroad if they are served by both UP and NS. With that reduction in options also comes an equally important consideration – the loss of commercial leverage – where a shipper/customer had the ability to negotiate with both carriers in an attempt to obtain the lowest rate possible for their shipments. There would also be situations where there would be a 3-to-2 reduction where a shipper/customer could be served by both UP and NS along with another Class I or Regional carrier and although it would arguably be an unusual situation for the Board to have to go this deep. With that said, a shipper/customer still would see their options and leverage ability reduced if the proposed transaction submitted by the Applicants is approved by the Board.

Reciprocal Switching – A Genuine Remedy Or A Lost Promise?

As someone who worked in the Revenue Accounting area for CPRS/CPKC for 15 years, I regularly encountered situations involving Reciprocal Switching whether it was an interline-received shipment or an interline-originated shipment and whether it was with a disputed invoice or a dispute in the Interline Settlement System (I.S.S.). And while those situations are covered in public tariffs and are generally straightforward and easy to understand, the Reciprocal Switch question takes on a whole new dimension with regard to the proposed transaction submitted by the Applicants primarily because so many of the steps/links to make it work the way it's supposed to work are effectively in the hands of a merged UP-NS. So, in the case of a captive shipper located on a merged UP-NS, while the supposed remedy of Reciprocal Switching would be "available" for them, just how well would that availability conceivably work for them when they actually wanted to exercise that option? Consider the steps involved in the process: (1) When a shipper/customer has a car(s) ready to ship from their facility, the competing carrier that the shipper/customer wants to use typically does not have physical access to the shipper/customer's facility. (2) As such, the serving railroad (in this case, UP-NS) has to agree (or worse, be ordered) to pick up the car(s) from the customer's facility and move them to an actual interchange point with the competing carrier that this shipper/customer wants to use. (3) Now, this movement to the interchange point with the competing carrier has to be covered by the governing tariff/contract, satisfy the prescribed routing along with any commodity or station restriction. (4) The competing carrier that this shipper/customer wants to use has to have

the ability and be willing to quote the linehaul rate for their portion. (5) The actual switch charge, or any intermediate switch charge along with the equipment cost, interchange delay and any added transit variability all have to leave the competing carrier's price advantage intact. (6) The serving railroad (UP-NS) has to perform the first/last-mile duties consistently and reliably enough to ensure that the competing option stays commercially usable and viable. (7) In the case where a switch is refused, delayed or suddenly priced differently or made operationally impractical, the shipper/customer needs somewhere to go.

So while in some instances the Reciprocal Switch question/process is a bit more cut-and-dried, in the case of a merged UP-NS, it becomes much more complicated for any affected shipper/customer that wishes to find a competitive option when they're effectively captive to the UP-NS network. From the steps I've outline above, it's easy to see how things would have to work just right and in concert with each other to make it work effectively and ideally for any captive shipper/customer. And from someone who not only has had experience in Field Operations but has also spent much time watching, observing and listening to what actually goes on out on the property, I can confidently state that there's a very fine line between getting something like this executed properly and efficiently and having things fall apart in the course of a few hours and watching the downstream effects linger for hours or days at a time. A series of events that would see the latter scenario become commonplace could easily render the Reciprocal Switch option for a shipper/customer useless – and that's just from an operating perspective. A combined UP-NS could easily flex its muscle on the commercial front and make the switching and intermediate costs exponentially higher that would easily eliminate the commercial value of the Reciprocal Switch option.

The UP-CN Memorandum of Understanding – The Railroad Industry's Version Of The Herschel Walker Trade

One of the most bizarre, unexpected and misunderstood developments prior to the Board's issuance of Decision No. 21 that removed this proceeding from abeyance was the Memorandum of Understanding (MOU) struck by one of the Applicants – Union Pacific – and one of the non-Applicants that had previously expressed opposition to the proposed transaction – Canadian National (CN) on 7-22-26. As such, CN has agreed to not oppose the proposed transaction submitted by the Applicants. Just as important, both parties have come to agreement on access to each other's respective properties – some agreements which can be executed regardless of the outcome of the proposed transaction and other agreements that hinge on the approval of the proposed transaction. For the immediate future, UP is slated to receive access over CN's crown jewel, the former Elgin, Joliet & Eastern (EJE) which would effectively give UP a relatively congestion-free route over the Chicago gateway to link its legacy territory with that of fellow Applicant NS; specifically NS's ex-New York Central Chicago – New York mainline that it controls between the Chicago gateway and Cleveland, OH. CN meanwhile receives operating rights between the

Memphis gateway and the Eagle Pass, TX gateway. But there are three other components of the overall agreement that are contingent upon approval of the proposed transaction submitted by the Applicants by the Board: (1) CN gaining access to a handful of shipper facilities where Class I rail options would be reduced from 2-to-1 or 3-to-2 “where commercially and operationally feasible” per the agreement. (2) CN acquiring ownership interests in the Kansas City Terminal Railway (KCT) and the Terminal Railroad Association of St Louis (TRRA) to ensure UP does not gain majority control of the terminal railroads at these two critically important gateways. (3) CN gaining new access in the Midwest through overhead rights between Tuscola, IL and East St Louis, IL and rights to serve customers between St Louis, MO and Kansas City, MO via UP thus giving CN an entrance to the Kansas City gateway that it has never had before.

At first glance, much of this seems quite significant and expansive and, to a degree, it is. However, the devil is always in the details and one has to peel back the onion to find the flaws in this agreement and they are numerous. When I started taking a hard look at this agreement shortly after it was announced, my initial reaction was to liken this agreement to the infamous trade that was made back in 1989 between two NFL teams – the Minnesota Vikings and the Dallas Cowboys – where the latter sent running back Herschel Walker to the Vikings and the Cowboys in turn received numerous first- and second-round draft picks that eventually helped the Cowboys turn into a dynasty in the 1990s including three Super Bowl victories. The Vikings meanwhile saw their hopes of having a potentially game-changing player in Walker go south as Walker’s performance in Minnesota dropped off dramatically after two weeks and it took them a number of years to recover from this ill-advised trade. To this day in fact, many regard this as the most lopsided trade in history (as you can probably tell by my e-mail address, I have no allegiance to either involved team but I don’t want to veer too far off track here). In many respects, I see CN in much of the same position that the Minnesota Vikings found themselves in after that ill-advised transaction. While obtaining trackage rights over UP to access the Eagle Pass, Texas gateway might be viewed as a homerun by some, one must take into consideration that even with the new traffic and O/D pairs that can be established, the level and consistency of service will ultimately hinge on how well CN can operate as a tenant railroad over a long distance (Memphis, TN to Eagle Pass, TX) and in this era of PSR, that’s likely asking for the moon with the stars to come. I question as well how, given this somewhat tenuous set-up, can this access remain a vital and profitable operation for CN over the long-term. Another consideration is how much incentive does Ferromex (FXE) have to interchange traffic with CN at the Eagle Pass gateway over the long-term – especially considering the other cross-border gateways that FXE currently serves. Even more concerning is the fact that CN will have to construct a new connection track at Tuscola to connect CN’s Champaign Sub mainline with UP’s Pana Sub mainline to allow for seamless moves between the two properties plus the fact that if/when traffic levels warrant, CN would have to establish new crew bases between Tuscola and the Eagle Pass gateway. To me, there’s just so much uncertainty with all of these aspects that make this a very iffy proposition at best and makes one wonder why CN thought it was making a breakout move with this alone.

The access to the Kansas City gateway – which is contingent on approval of the proposed transaction submitted by the Applicants – is even more convoluted. Here, CN hopes to establish trackage rights over UP between St Louis and Kansas City with an option to buy one of the current UP routes as well as UP's ex-MP Neff Yard in Kansas City. And while this would add a new gateway entrance for CN to tap, the major concern quite obviously becomes what exactly CN even hopes to establish at the Kansas City gateway. What other carrier would have ANY incentive to interchange traffic to CN and short-haul itself over Kansas City when UP-NS, BNSF and CPKC all have the ability to control the longer haul to the Chicago gateway instead? If the need for CN or predecessor IC/ICG to access the Kansas City gateway was so acute, why didn't predecessor IC submit a bid for this line back in the mid-90s when they could have? In fact, why did predecessor Illinois Central Gulf spin off the former Gulf, Mobile & Ohio mainline in the first place back in 1987?

I think it's important to remember, too, that if CN was truly interested and invested about doing something meaningful at a midwestern gateway, they have had the ability to do so since **1998** when it purchased Illinois Central – a purchase that also included the former IC/ICG/CC Iowa Division mainline that the Illinois Central re-purchased in 1996 after ICG had spun off the Iowa Division mainline in December 1985 to the erstwhile Chicago, Central & Pacific – that gave the CN access to both the Council Bluffs and Sioux City gateways and the ability to interchange traffic with both UP and BNSF at those gateways. But in the more than 25 years that CN has had the access and ability to lengthen its haul with a number of commodities – including auto and auto parts traffic that it originates – by utilizing the Council Bluffs gateway, it has steadfastly refused to do so and instead has relied on low-hanging fruit commodity-types to bolster traffic on its Iowa Division mainlines – grain, DDG (mash) and ethanol. One might argue that CN wasn't well-positioned to push the Council Bluffs gateway in the first place due to the fact that UP has had its own direct route to the Chicago gateway from Council Bluffs and Fremont, NE when it acquired traditional Overland Route partner (and little brother) Chicago & North Western (CNW) in 1995 along with the tunnel restrictions at East Dubuque, IL and the bridge height restrictions on its swing bridge over the Mississippi River over to Dubuque, IA plus the fact that its mainline between Council Bluffs and Tara, IA is dark territory and operated by Track Warrant Control (TWC). While I can buy into those arguments up to a certain point, I would argue that IF CN had actually been serious about turning its Iowa Division mainline into a true competitor that it could be (and should be), the tunnel/bridge restrictions at East Dubuque could easily be overcome with modifications. And also keep in mind that the dark territory between Council Bluffs and Tara certainly didn't deter predecessor IC/ICG from hauling fast meat trains out of Council Bluffs back in the 1950s and 1960s and into the 1970s that were destined for Chicago. For a railroad property that not only sits on some of the richest and abundant beef and pork-producing areas in the entire United States and also has one of the largest cereal-producing facilities in the world (Quaker Oats) within a stone's throw of its yard in downtown Cedar Rapids, IA, it's become quite clear over the years that CN has regarded it's Iowa Division property as the proverbial red-headed stepchild and there's no reason to believe that if CN is truly unable to interchange

significant traffic at the Council Bluffs gateway that it would do any better at the Kansas City gateway should they get access to it.

Perhaps even more significantly, you have to consider what CN gave up that allowed them to gain all of this new access as UP now has access to the one instrument that had given CN and CN alone the ability to be the master of its own fate over the Chicago gateway – the former Elgin, Joliet and Eastern (EJE). With this access over EJE, the UP no longer has to rely on traversing the congested Belt Railway of Chicago (BRC) or the Indiana Harbor Belt (IHB) and would be able to link the legacy UP and legacy NS networks more effectively with the access to the former EJE. But the relatively congestion-free aspect that former EJE has given the CN since it acquired the EJE back in late December 2009 will suddenly take on a new look as CN will effectively now have to compete with UP for access over the Chicago gateway and the fact that CN was willing to put its crown jewel in play looms much larger than what they actually received in this settlement with UP – hence, the reference to the aforementioned Herschel Walker trade in 1989. Even CPKC President and CEO Keith Creel reiterated as much when he was questioned about this UP-CN settlement when he said, “I hope CN doesn’t have buyer’s remorse in the future [because of] what they gave up versus what they got. Because I don’t think they got a lot”.

I will also point out two opportunities that could have been addressed but were completely whiffed on by both UP and CN. (1) The creation of a paired track arrangement in western Iowa between Denison and Council Bluffs. Although, UP obviously would benefit more from such an arrangement, it would be a significant capacity-enhancer for UP in the Chicago – Council Bluffs/Fremont corridor should the proposed transaction submitted by the Applicants be approved. Just as important, it could also prove to be a true game-changer for CN and traffic opportunities to and from Council Bluffs as well as other shippers/customers in western Iowa – if CN is indeed serious about going after new and more lucrative traffic in Iowa. It’s something that should have been pursued by legacy component railroads CNW and IC/ICG decades ago and that opportunity is still very much present today. (2) The other opportunity that could have been realized for CN was an entrance into the Albert Lea, Minnesota gateway. This could be achieved by the CN putting back in service the segment of its Osage Sub secondary mainline between Myrtle, MN and Glenville, MN where it connects to UP’s Albert Lea Sub mainline (Spine Line) for access to Albert Lea; restoring access that predecessor railroads IC/ICG/CC enjoyed for many years. Again, if enhancing competition is supposed to be a primary consideration of the 2001 merger rules adopted by the Board, these two items – had they been properly addressed by UP and CN – could have gone a long way in support of that enhancement. Instead, UP and CN either failed to recognize these two opportunities or, even worse, ignored both possibilities altogether.

Passenger Rail – The Forgotten Yet Critical Component That Stands In The Crosshairs Of A Combined UP-NS

One of the most critical components of this proposed transaction that has been submitted by the Applicants is that of passenger rail. And it is also one of the most sensitive elements of this proposed transaction as a combined UP-NS system would arguably reshape this country's rail network for generations and would have far-reaching implications for this country's current passenger rail network as we know it today and a network that desperately needs to be expanded. Given that both Applicants host Amtrak service on significant portions of their systems and given UP's somewhat dicey (at best) on-time performance with Amtrak trains operating on some of its important mainlines, the passenger rail aspect deserves close scrutiny by the board.

When it comes to Amtrak's long-distance (LD) network, it should come as no surprise that the Sunset Limited which operates on UP between New Orleans, LA and Los Angeles, CA has historically had some of the most disappointing on-time performance statistics over a number of years. For instance, in the first quarter of 2022, the Customer On-Time Performance was at 40% which would slip to 24% in the second quarter of 2022 and would fall to a frightening 10% in the third quarter of 2022 and improve to only 11% in the fourth quarter of 2022 for westbound service. Eastbound service was just as unpredictable and unacceptable as the first quarter 2022 stats showed 40% which dropped to 35% in the second quarter of 2022 and fell precipitously to 11% in the third quarter of 2022 to an abysmal 7% in the fourth quarter of 2022. Though both UP and Amtrak were eventually able to come to reach a settlement in 2025 regarding Sunset Limited service disruptions, it represents a hallmark example of UP's attitude toward passenger rail on its system and it becomes easy to see how issues such as this could not only become more problematic but could also expand to passenger operations on the legacy NS network if the proposed transaction is approved by the Board.

Passenger rail expansion could also be at risk if the proposed transaction submitted by the Applicants were to be approved by the Board. UP has typically been non-receptive if not outright hostile towards many passenger rail expansions that include operation(s) on UP-controlled territories. As a passenger rail advocate, I find this very alarming and I would hope that the Board would as well. Two notable passenger rail expansion possibilities in the Upper Midwest alone – Chicago - Twin Cities via Madison, Camp Douglas, and Eau Claire would utilize UP's Camp Douglas and Altoona subs while Twin Cities – Kansas City would utilize UP's Albert Lea, Mason City, Trenton and Kansas City Subs (Spine Line mainline) between St Paul and Polo/Kansas City, MO – are two proposals that would require considerable cooperation from UP to assure a successful operation. But how could meaningful cooperation from UP be assured in a UP-NS mega-system? I would respectfully urge the Board to take these considerations into careful review as a combined UP-NS system could have drastic implications for both current and proposed passenger rail projects.

For a railroad such as UP that has the world-famous "Cities" passenger trains as a part of its corporate legacy, I find UP's current stance toward passenger rail alarming to say the least.

Possible Downstream Effects Of A UP-NS Combination

It would be nearly impossible for the Board not to take into consideration the likely downstream effects of the proposed combination being pursued by Applicants UP and NS. Should the Board approve the proposed transaction submitted by the Applicants, the two remaining East-West carriers – CSXT and BNSF – will likely file their own transcontinental merger application to counter a combined UP-NS. That retaliatory response by BNSF-CSXT would then leave the US with two major east-west transcontinental systems and two north-south carriers – CPKC and CN. The question we do not have an answer to is if either of these two north-south carriers – CPKC and CN – can survive long-term as independents. I'd like to think that they can and I'm hopeful that they could but there would be significant economic challenges for both to survive as independents **unless** both were able to attain either trackage rights or acquire divested lines from either east-west carrier that would give them entry into new markets and territories that could provide some semblance of meaningful competition. But even with that, there's no assurances that that alone would provide enough economic relief for either carrier which could force either or both of them at the mercy of an enlarged UP or BNSF. And should that ever happen, the vital lines of both CPKC and CN could easily become redundant for both UP and BNSF as mammoth transcontinental carriers. Thus, the question that the Board might eventually have to answer is this what we really want – both CPKC and CN being folded into either of these larger carriers (UP and BNSF) that might jeopardize the long-term need of many of the vital lines these two carriers operate today?

As someone who has witnessed first-hand the removal of many vital lines between the 1960s and the 1980s and the consequences those abandonments meant for not only shippers but also for the communities those lines served and the resulting economic upheaval that followed, I cannot believe for one second that this is something that the esteemed members of the Board would want. We have seen so many different lines – mainlines included – lost because of consolidation or the financial hardships of carriers in the last 50 years – the Milwaukee Road's Pacific Coast Extension and it's Iowa Division mainline across my home state of Iowa. The Erie Lackawanna mainline west of Buffalo. The former Missouri Pacific mainline west of Herington, KS. Virtually all of the Chicago Great Western. I could name many more. We've lost FAR too much trackage over the years which has not only hurt communities but has drastically reduced true competition in the railroad industry

Conclusion

I respectfully submit to the Board my opinion that Applicants UP and NS have not been able to demonstrate in their revised filing that the proposed combination offers real and genuine remedies to shippers and receivers who could be irreparably harmed by the

proposed transaction if it was to be approved by the Board. As such, I would respectfully ask the Board to reject the revised filing submitted by the Applicants as it does not present a *prima facie* case for consideration by the Board. The Committed Gateway Pricing (CGP) Program proposed by the Applicants does not do nearly enough to protect the concerns of shippers and customers for competitive rates at the five primary gateways where UP and NS connect – Chicago, St Louis, Kansas City, Memphis and New Orleans. Moreover, the program itself provides only a temporary solution for those shippers and customers that qualify as this program would expire when Board oversight of the transaction expires. Reciprocal Switching is another instrument that can provide relief for a captive shipper/customer but the downside is that there are most often conditions that effectively limit the viability of this instrument whether it's the incumbent railroad levying a hefty switch charge that could drastically reduce the connecting railroad's ability to offer a competitive rate or problems and delays at the actual interchange point between the incumbent carrier and the competing carrier that the shipper/customer wants to use. Passenger rail considerations also stand to suffer immensely should proposed transaction be approved. Moreover, the Memorandum of Understanding (MOU) that was worked out by one of the Applicants – UP and competing carrier CN is not only one of the most lopsided agreements between two different railroads ever but it also does little to address the competitive harms that the proposed UP-NS combination pose and it also leaves out two major considerations that could have provided capacity enhancements for both UP and CN as well as provided access for CN to the Albert Lea gateway. Finally, the inevitable downstream effects that the proposed UP-NS combination would create could seriously pose significant structural changes for the rest of the industry and some of those changes could result in unnecessary abandonments of vital lines that would only cause more harm for shippers and communities.

I appreciate the ALJ's and Board's consideration of my comments in this letter. Please feel free to contact me anytime if you have any questions or concerns.

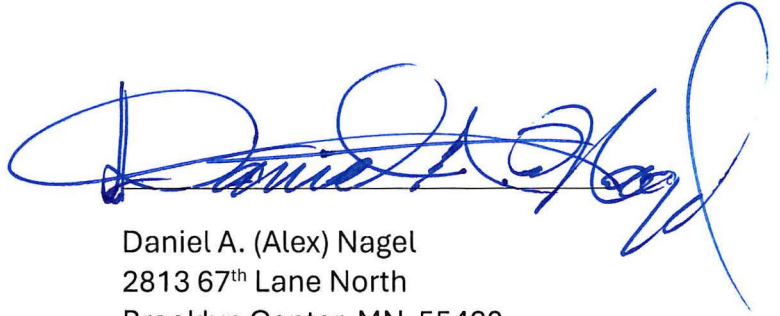
Sincerely,

Daniel A. (Alex) Nagel

Retired, Revenue Accounting Senior "C" – Canadian Pacific Kansas City Railroad Company
Member-Board of Directors – All Aboard Minnesota
Brooklyn Center, MN 55430

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Second Letter of Comment to be served electronically or by first-class mail, postage prepaid, to everyone formally involved in this case, as required in Finance Docket No. 36873.



Daniel A. (Alex) Nagel
2813 67th Lane North
Brooklyn Center, MN 55430
(612) 670-8548 (cell)
(763) 566-7353 (landline)
alexlarams@earthlink.net

Dated: September 16, 2026