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Grace Gallucci, Executive Director & CEO

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ENTERED
Office of Chief Counsel
September 25, 2026
Part of
Public Record

September 22, 2026

Surface Transportation Board
395 E Street SW
Washington, DC 20423

RE: Notice of Intent to Participate in Proceedings Regarding Docket No. FD 36873

To Whom It May Concern,

The Northeast Ohio Areawide Coordinating Agency (NOACA) is the federally designated metropolitan planning organization (MPO) for Greater Cleveland, representing Cuyahoga, Geauga, Lake, Lorain, and Medina counties. NOACA addresses transportation, environmental and economic development issues throughout Northeast Ohio, coordinating with its partners to develop and implement regionally significant plans including the Long Range Plan (LRP), the Transportation Improvement Program (TIP), and the Comprehensive Economic Development Strategy (CEDS) for the region.

This letter is to declare NOACA's intent to participate in the proceedings regarding docket number FD 36873 concerning the proposed merger of Union Pacific Corporation and Norfolk Southern Corporation. As the entity responsible for transportation planning in Greater Cleveland, NOACA has an interest in the potential merger and how it will affect both passenger and freight rail service in our region currently operated on Norfolk Southern trackage.

I can be contacted via email at ggallucci@mpo.noaca.org and via telephone at 216-241-2414 extension 100.

Sincerely,

Grace Gallucci
Executive Director & CEO

GG:ab:ml

CC: The Office of the U.S. Secretary of Transportation
The Office of the Attorney General of the United States
Michael L. Rosenthal (Union Pacific)
Raymond A. Atkins (Norfolk Southern)
Hon. Jennifer Soulikias, STB Administrative Law Judge