



RETAIL INDUSTRY LEADERS ASSOCIATION

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September 27, 2026

Surface Transportation Board
395 E Street, SW
Washington, DC 20423

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Office of Chief Counsel
September 28, 2026
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Public Record

Re: Docket No. FD 36873, Union Pacific Corporation—Control—Norfolk Southern Corporation

Dear Chairman and Members of the Board:

The Retail Industry Leaders Association (RILA) appreciates the opportunity to comment on the proposed combination of Union Pacific and Norfolk Southern. RILA represents leading retailers that depend on reliable, competitive, and cost-effective freight transportation to move goods throughout the United States. Because intermodal rail is an important component of many retail supply chains, this transaction could have significant implications for service, capacity, rates, and supply chain resilience.

RILA is a trade association of the world's largest, most innovative, and recognizable retail companies and brands. RILA members include more than two hundred retailers, product manufacturers, and service suppliers, that together employ over 42 million Americans and account for \$2.7 trillion in annual sales and hundreds of thousands of stores, manufacturing facilities, and distribution centers domestically and abroad.

RILA recognizes that a more integrated rail network could offer benefits, including fewer interchanges, expanded single-line service, improved transit times, and broader access to markets. At the same time, further consolidation among Class I railroads could reduce customer choice and increase the risk of higher rates, additional fees, diminished service quality, or disruptions during network integration.

RILA is not taking a position at this stage on whether the Board should approve or deny the transaction. Rather, RILA urges the Board to conduct a rigorous, fact-based review of its effects on competition and retail supply chains. Any approval should be supported by clear evidence that the combination will enhance—not merely promise—service, reliability, capacity, and competition. The Board should also consider enforceable, measurable, and durable conditions that protect customer choice, provide meaningful remedies for service failures, prevent unreasonable rate or

fee increases, preserve reciprocal switching and gateway access where needed, and require transparent reporting on service performance and network integration.

Retailers require predictable transportation service to maintain inventory, support stores and distribution centers, and keep consumer costs down. At a time when cost concerns are heightened by elevated fuel prices and increased tariffs, additional costs from this merger would further strain American family budgets. The Board's review should account for both the proposed transaction's potential efficiencies and its possible direct and downstream effects, including whether it could prompt additional industry consolidation.

RILA looks forward to participating in this proceeding and respectfully requests that the Board place the interests of rail customers, competition, service reliability, and supply chain resilience at the center of its review.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Armstrong", with a stylized flourish at the end.

Evan Armstrong
Senior Vice President, Government Affairs
Retail Industry Leaders Association

CC: Parties of Record

