

BEFORE THE
SURFACE TRANSPORTATION BOARD
WASHINGTON, D.C. 20423

ENTERED
Office of Chief Counsel
September 29, 2026
Part of
Public Record

Docket No. FD 36873

COMMENT AND PROTEST OF MISSOURI STATE SENATOR CURTIS TRENT

Missouri State Senator Curtis Trent submits this comment and protest and requests that the Board **deny** the Application of Union Pacific Corporation, Union Pacific Railroad Company, Norfolk Southern Corporation, and Norfolk Southern Railway Company.

As the State Senator from Missouri's 20th Senatorial district, Missouri voters have a long history with rail. Missouri Pacific (which later became part of Union Pacific) historically had lines in the broader southwest part of this state where my senate district is located.

This Transaction would create a system of approximately 50,000 miles handling close to half of the nation's rail freight. That further concentrates an industry that has already been reduced. Missouri manufacturers, agricultural producers, energy shippers, and consumers depend on competitive and reliable freight rail. Missouri shippers still experience the aftereffects of the last major merger wave of the 1990s and early 2000s. Approval would shrink remaining options, increase the risk of service disruption, and raise costs. The STB requires mergers to meet a standard of substantial and demonstrable public benefit – this merger fails that test.

For these reasons, Senator Trent protests the Transaction and requests the Board deny the application in Docket No. FD 36873.

Respectfully submitted this 29th day of September, 2026.

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CERTIFICATE OF SERVICE

I certify that on September 29, 2026, a copy of this Comment and Protest was served by email on counsel for the Applicants.

Curtis Trent