

BEFORE THE
SURFACE TRANSPORTATION BOARD

STB Docket No. 36873

ENTERED
Office of Chief Counsel
September 30, 2026
Part of
Public Record

UNION PACIFIC CORPORATION AND UNION PACIFIC RAILROAD COMPANY

—CONTROL—

NORFOLK SOUTHERN CORPORATION AND NORFOLK SOUTHERN
RAILWAY COMPANY

**NOTICE OF APPEARANCE, REQUEST FOR INTERESTED-PARTY STATUS, AND
REQUEST FOR INCLUSION ON SERVICE LIST**

Naugatuck Railroad Company (“NAUG”), by and through its undersigned counsel, respectfully submits this Notice of Appearance and requests that the Surface Transportation Board (the “Board”) recognize NAUG as an interested party in this proceeding and include NAUG and its counsel on the official service list. In support of this request, NAUG states as follows:

1. On April 30, 2026, Union Pacific Corporation, Union Pacific Railroad Company, Norfolk Southern Corporation, and Norfolk Southern Railway Company (collectively, the “Applicants”) filed an Amended Railroad Control Application (the “Amended Application”) seeking Board authority, under 49 U.S.C. §§ 11323–11325, for the acquisition of control by Union Pacific Corporation of Norfolk Southern Corporation and, through it, Norfolk Southern Railway Company (the “Transaction”).
2. NAUG is a Class III rail carrier organized under the laws of the State of Connecticut with its principal place of business at 242 Main Street, Thomaston CT 06787.

3. NAUG has a direct and substantial interest in this proceeding because (a) its sole interchange is with Pan Am Southern, LLC (“PAS”), which is jointly owned by Norfolk Southern Railway (“NS”)¹ and CSX Corporation (“CSX”); (b) the routing of inbound and outbound cars is on PAS to NS at Mechanicville, New York, and to CSX at Rotterdam Junction, New York; and (c) NS establishes the Interline Settlement System rates and divisions with respect to the Mechanicville routing.
4. The outcome of this proceeding may materially affect NAUG’s interests, including, without limitation, frequency of interchange, availability of cars, rates, and customer service. Accordingly, NAUG seeks to monitor the proceeding, review filings and evidence submitted by other participants, and participate as permitted by the Board’s regulations and any procedural schedule established in this docket.
5. NAUG requests that all filings, notices, orders, correspondence, and other documents served in this proceeding be served on the following counsel of record:

John R. Gamm, Esq.

John R Gamm LLC

32 Dutton Place Way

Glastonbury, CT 06033

Telephone: (860) 212-5150

Email: jgamm@gammesq.com
6. NAUG will comply with all applicable Board rules, orders, filing requirements, and procedural deadlines in this proceeding. This filing is not intended to waive, and NAUG

¹ NS owns a 50% interest in PAS.

expressly reserves, any rights, positions, objections, claims, or remedies it may have with respect to the Transaction or this proceeding.

REQUEST FOR RELIEF

For the foregoing reasons, NAUG respectfully requests that the Board:

- (a) recognize NAUG as an interested party in this proceeding;
- (b) add NAUG and the undersigned counsel to the official service list for this proceeding;
- and
- (c) grant such other and further relief as the Board considers appropriate.

Respectfully submitted,

Naugatuck Railroad Company

By its counsel,



John R. Gamm, Esq.

John R Gamm LLC
32 Dutton Place Way
Glastonbury, CT 06033
Telephone: (860) 212-5150
Email: jgamm@gammesq.com

Dated: September 22, 2026

CERTIFICATE OF SERVICE

I hereby certify that, on September 29, 2026, I caused a copy of the foregoing Notice of Appearance, Request for Interested-Party Status, and Request for Inclusion on Service List to be served on all parties on the Board's official service list in STB Docket No. 36873, electronic service through the Board's e-filing system, in accordance with the Board's rules and applicable orders in this proceeding.



John R. Gamm