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COMMITTEE ASSIGNMENTS:
FINANCE (CHAIR)
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RULES

September 30, 2026

The Honorable Patrick J. Fuchs
Chairman
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

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

Dear Chairman Fuchs and Members of the Board:

I write regarding the proposed Union Pacific/Norfolk Southern merger and the potential consequences of this transaction for the Commonwealth of Virginia.

I have spent much of my career working on transportation policy in Virginia, including serving as Virginia Secretary of Transportation and on the House Transportation Committee. From that experience, I know that changes to our transportation network can have economic consequences that extend far beyond the railroad itself. In considering a transaction of this magnitude, I urge the Board to look closely at two issues of particular importance to Virginia: the competitiveness of the Port of Virginia and the impact on railroad workers.

As Secretary overseeing the planning for investments that have made the Port of Virginia one of the strongest on the east coast, I know the central role rail service plays to world trade. Coal exports from mines over 450 miles away – traditionally our number one export – result in well-maintained rail beds throughout Virginia. We recognized that the strength of this rail network was the key to the most efficient movement of goods for the bulk of the Midwest, not just being a major hub for direct ocean to rail access for southern and eastern markets. The Port relies on rail service by both Norfolk Southern and CSX. Any transaction

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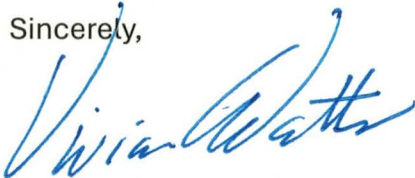
that could affect service quality, interchange opportunities, investment decisions, or the competitive options available to shippers deserves careful scrutiny.

I am equally concerned about the effect of this transaction on railroad employees and the communities in which they live and work. The Board has already required the applicants to publicly disclose employee-impact information concerning railroad worker jobs that could be eliminated, created, or transferred as a result of the merger. Those impacts should be at the state and local level in addition to the national level. Virginia workers deserve a clear understanding of what this transaction could mean for jobs, work locations, operations, and the long-term railroad workforce in the Commonwealth.

The Commonwealth has invested heavily in our ports, freight infrastructure, and transportation network. I have major concerns that if this merger is approved, it could have negative and far-reaching impacts on the Port of Virginia, rail competition, service reliability, and Virginia's railroad workforce.

I appreciate the Board's consideration of these concerns and respectfully ask that Virginia's interests receive careful consideration as the record develops.

Sincerely,



Delegate Vivian E. Watts
Member, Virginia House of Delegates
14th District