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Via Electronic Mail

September 22, 2026

Ms. Danielle Gosselin
Director, Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423
Danielle.Gosselin@stb.gov

Re: Docket No. FD 36873, *Union Pacific Corporation and Union Pacific Railroad Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company*

Dear Director Gosselin:

On behalf of Union Pacific (UP) and Norfolk Southern (NS), together with their respective holding companies Union Pacific Corporation (UPC) and Norfolk Southern Corporation (NSC) (collectively, Applicants), enclosed please find the updated Appendix 1 to Applicants' Safety Integration Plan, which Applicants submitted to the Federal Railroad Administration in connection with the above-captioned matter.

Please contact me with any questions.

Respectfully submitted,

/s/ Michael L. Rosenthal
Michael L. Rosenthal

Attorney for Union Pacific Corporation and Union Pacific Railroad Company

Enclosure Updated Appendix 1 to the Safety Integration Plan

Appendix 1 (Revised August 14, 2026)
SIP Timeline and Accountabilities Chart
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Glossary

Term	Definition
Control Date	Day that control authority is consummated
Month 1	The first month after the Control Date
Month 36	The thirty-sixth month after the Control Date
Pre-Closing	Prior to the Control Date

CORPORATE CULTURE						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
A.1	Conduct risk-based hazard analysis	Pre-Closing	Month 6	W. Walsh, Director of Industrial Hygiene	Safety	
A.2	Integration of safety management systems			W. Walsh, Director of Industrial Hygiene	Safety	
A.2.a	Review safety management systems	Month 6	Month 18	W. Walsh, Director of Industrial Hygiene	Safety	
A.2.b	Consolidate safety management systems	Month 13	Month 24	W. Walsh, Director of Industrial Hygiene	Safety	
A.2.c	Communicate revisions to management systems	Month 21	Month 24	W. Walsh, Director of Industrial Hygiene	Safety	
A.3	Integration of risk reduction plan			W. Walsh, Director of Industrial Hygiene	Safety	

CORPORATE CULTURE						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
A.3.a	Review risk reduction plans	Pre-Closing	Month 3	W. Walsh, Director of Industrial Hygiene	Safety	
A.3.b	Consolidate risk reduction plans	Month 4	Month 15	W. Walsh, Director of Industrial Hygiene	Safety	
A.3.c	Communicate consolidated risk reduction plan	Month 12	Month 18	W. Walsh, Director of Industrial Hygiene	Safety	
A.4	Integration of employee feedback programs			K. Anderson, Senior Director Safety	Safety	Includes technology evaluation and integration.
A.4.a	Review employee feedback programs	Pre-Closing	Month 6	K. Anderson, Senior Director Safety	Safety	
A.4.b	Consolidate employee feedback programs	Month 7	Month 24	K. Anderson, Senior Director Safety	Safety	

CORPORATE CULTURE						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
A.4.c	Communicate employee feedback programs	Month 19	Month 24	K. Anderson, Senior Director Safety	Safety	
A.5	Implement C3RS	TBD (subject to final agreement with the FRA)	TBD (subject to final agreement with the FRA)	N. Perez, Manager Safety Field Operations	Safety	
A.6	Review and consolidate safety department structure	Month 1	Month 18	D. O'Hara, General Director of Operating Practices	Safety	

TRAINING						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
B.1	Establish dedicated committees, councils, and work groups responsible for integrating training	Pre-Closing	Month 6	I. Cooper, General Director Training	Training	
B.2	Review NS training approaches to identify best-in-class training features to include in integrated training program	Pre-Closing	Month 24	I. Cooper, General Director Training	Training	
B.3	Phase in training on UP operating rules and operating systems	Month 1	Month 12	I. Cooper, General Director Training D. O'Hara, General Director of	- Operating Practices - Training	The first 12 months will focus on converting operating rules; operating systems conversion

TRAINING						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
				Operating Practices		will take 36 months.
B.4	Implement UP training applications and platforms across NS systems	Month 13	Month 36	I. Cooper, General Director Training	Training	
B.5	Educate NS trainers on changes to the training program	Month 1	Month 36	I. Cooper, General Director Training	Training	
B.6	Redesign and consolidate training programs	Month 1	Month 36	I. Cooper, General Director Training	Training	
B.7	Provide employees required training for transition	Month 1	Month 36	I. Cooper, General Director Training	Training	

TRAINING						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
B.8	Make appropriate regulatory submissions and seek regulatory approval for training changes as needed	Month 1	Month 36	D. O'Hara, General Director of Operating Practices I. Cooper, General Director Training	- Safety - Training	

OPERATING PRACTICES						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
<i>Operating Rules</i>						
C.1.a	Review operating rules and practices to determine best fit for the combined practice	Pre-Closing	Month 6	J. Taullie, Director of Operating Practices and Rules	Operating Rules and Practices	
C.1.b	Develop process for communicating rule and policy changes	Pre-Closing	Month 12	J. Taullie, Director of Operating Practices and Rules I. Cooper, General Director Training	- Operating Rules and Practices - Training	
C.1.c	Consolidate rulebooks and instructions, which will include the General Code of Operating Rules	Month 1	Month 12	J. Taullie, Director of Operating Practices and Rules	Operating Rules and Practices	

OPERATING PRACTICES						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
C.1.d	Implement uniform set of operating rules and practices across the combined company	Month 1	Month 12	J. Taullie, Director of Operating Practices and Rules	Operating Rules and Practices	
C.1.e	Align training program with uniform operating rules	Month 1	Month 36	J. Taullie, Director of Operating Practices and Rules I. Cooper, General Director Training	- Operating Rules and Practices - Training	
C.1.f	Communicate rule and policy changes to employees to ensure familiarity with any new rules or practices	Month 1	Month 12	J. Taullie, Director of Operating Practices and Rules I. Cooper, General Director Training	- Operating Rules and Practices - Training	

OPERATING PRACTICES						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
C.1.g	Provide training	Month 1	Month 12	K. Anderson, Senior Director Safety I. Cooper, General Director Training	- Operating Rules and Practices - Training	Coaching, Observation, Mentoring, and Monitoring with Integrity and Trust (COMMIT)
C.1.h	Monitor rules performance throughout integration process and make necessary adjustments	Month 1	Month 36	K. Anderson, Senior Director Safety	Operating Rules and Practices	COMMIT
C.1.i	Review and consolidate operational testing programs	Month 1	Month 36	K. Anderson, Senior Director Safety	Operating Rules and Practices	COMMIT

OPERATING PRACTICES						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
<i>Alcohol and Drug</i>						
C.2.a	Review drug and alcohol programs	Pre-Closing	Month 12	P. Larm, General Director Health Services	Drug & Alcohol	
C.2.b	Consolidate drug and alcohol programs	Month 13	Month 24	P. Larm, General Director Health Services	Drug & Alcohol	Will require FRA 219 plan change approval with a targeted completion by end of Year 2 in consideration of technology dependencies.
C.2.c	Train employees on program and applicable regulations	Month 1	Month 24	P. Larm, General Director Health Services I. Cooper, General Director Training	- Drug & Alcohol - Training	NS employees will continue required training using current NS training until program cut over. Will then train on UP programs.

OPERATING PRACTICES						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
<i>Qualification and Certification</i>						
C.3.a	Review 49 C.F.R. Part 240 and Part 242 programs	Month 1	Month 12	J. Taullie, Director of Operating Practices and Rules	- Operating Practices - Training	
C.3.b	Consolidate 49 C.F.R. Part 240 and Part 242 programs	Month 1	Month 36	J. Taullie, Director of Operating Practices and Rules	- Operating Practices - Training	
C.3.c	File consolidated 49 C.F.R. Part 240 and Part 242 programs if needed	Month 1	Month 36	J. Taullie, Director of Operating Practices and Rules	- Operating Practices - Training	

OPERATING PRACTICES						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
<i>Hours of Service</i>						
C.4.a	Review HOS programs and processes	Month 1	Month 6	D. Svatos, General Director Crew Management J. Elliott, Director Dispatching Practices and Workforce	- Crew Management - Signals and Communication - Dispatching	
C.4.b	Consolidate HOS programs and processes, including transitioning NS dispatchers to UP's digital preventative HOS compliance program	Month 1	Month 6	J. Elliott, Director Dispatching Practices and Workforce	- Crew Management - Signals and Communication - Dispatching	HOS programs, processes and compliance functions will be combined but ongoing data integration into a unified system is dependent on future tech integrations.
C.4.c	Maintain compliance	Month 1	Month 36	D. Svatos, General	Crew Management	

OPERATING PRACTICES						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
	with federal regulation			Director Crew Management • J. Elliott, Director Dispatching Practices and Workforce	• Signals and Communication • Dispatching	

MOTIVE POWER AND EQUIPMENT						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
D.1	Evaluate the mechanical needs of the combined network for repair and service locations and equipment	Pre-Closing	Month 36	L. Kavan, Senior Director Planning and Operations Support	Mechanical	
D.2	Implement changes as needed to the mechanical needs of the combined network for repair and service locations and equipment.	Month 1	Month 36	L. Kavan, Senior Director Planning and Operations Support	Mechanical	
D.3	Perform review of qualification programs to identify differences	Month 1	Month 18	L. Kavan, Senior Director Planning and Operations Support	- Mechanical - Training	
D.4	Consolidate qualification programs	Month 6	Month 24	L. Kavan, Senior Director	- Mechanical - Training	

MOTIVE POWER AND EQUIPMENT						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
				Planning and Operations Support • I. Cooper, General Director Training		
D.5	Provide training	Month 1	Month 36	• L. Kavan, Senior Director Planning and Operations Support • I. Cooper, General Director Training	• Mechanical • Training	

SIGNAL AND TRAIN CONTROL SYSTEMS						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
E.1	Review processes, standards, and systems	Pre-Closing	Month 12	C. Rose, Assistant Vice President Engineering Signal	- Signals and Communication - Dispatching - Mechanical - Information Systems	
E.2	Create detailed integration plan	Month 1	Month 24	T. Russell, Senior Director Ops Support Engineering	- Signals and Communication - Dispatching - Mechanical - Information Systems	
E.3	Integrate signal and train control systems and PTC back-office systems	Month 1	Month 36	T. Elkhatib, General Director Operating Technologies	- Signals and Communication - Dispatching - Mechanical - Information Systems	

SIGNAL AND TRAIN CONTROL SYSTEMS						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
E.4	Meet with the FRA to demonstrate compliance with regulatory requirements	Month 1	Month 36	J. Stearns, Director of Signal Compliance T. Elkhatab, General Director Operating Technologies	Signals and Communication	
E.5	Provide training	Month 13	Month 36	I. Cooper, General Director Training	- Signals and Communication - Training	

TRACK SAFETY STANDARDS AND BRIDGE STRUCTURES						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
F.1	Review assets and programs related to bridges and structures	Pre-Closing	Month 6	S. Ashmore, Assistant Vice President Engineering Infrastructure	Engineering	
F.2	Integrate programs and assets related to bridges and structures	Month 1	Month 36	S. Ashmore, Assistant Vice President Engineering Infrastructure	Engineering	
F.3	Review assets and programs related to track infrastructure	Pre-Closing	Month 36	S. Ashmore, Assistant Vice President Engineering Infrastructure	Engineering	
F.4	Integrate programs and assets related to track infrastructure	Month 1	Month 36	S. Ashmore, Assistant Vice President Engineering Infrastructure	Engineering	
F.5	Provide training	Month 1	Month 36	I. Cooper, General Director Training	- Engineering - Training	

HAZARDOUS MATERIALS						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
G.1	Review hazardous materials programs	Pre-Closing	Month 3	R. Bavier, Senior Director Hazardous Materials	Hazardous Materials Management	
G.2	Integrate NS hazardous materials staff into UP organizational structure and monitor staffing levels	Month 1	Month 3	R. Bavier, Senior Director Hazardous Materials	Hazardous Materials Management	
G.3	Review and integrate NS's hazardous materials inspection program into UP's prevention program	Month 1	Month 3	R. Bavier, Senior Director Hazardous Materials	Hazardous Materials Management	
G.4	Review and consolidate hazardous materials and related emergency response training into a single training program	Month 1	Month 12	R. Bavier, Senior Director Hazardous Materials	- Hazardous Materials Management - Training	

HAZARDOUS MATERIALS						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
G.5	Consolidate training equipment fleets into a single fleet	Month 1	Month 12	R. Bavier, Senior Director Hazardous Materials	Hazardous Materials Management	
G.6	Review emergency response plan and other contingency plans	Pre-Closing	Month 12	R. Bavier, Senior Director Hazardous Materials	Hazardous Materials Management	
G.7	Consolidate emergency response plan and other contingency plans	Month 1	Month 12	R. Bavier, Senior Director Hazardous Materials	Hazardous Materials Management	
G.8	Review and incorporate NS's third-party contractors into emergency response network	Month 1	Month 24	R. Bavier, Senior Director Hazardous Materials	Hazardous Materials Management	
G.9	Integrate all emergency response assets and adopt UP's	Month 1	Month 3	R. Bavier, Senior Director	Hazardous Materials Management	

HAZARDOUS MATERIALS						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
	maintenance and inspection program			Hazardous Materials		
G.10	Review and consolidate USHMI	Month 1	Month 24	R. Bavier, Senior Director Hazardous Materials	Hazardous Materials Management	
G.11	Review and integrate hazardous material documentation systems and processes	Month 1	Month 24	R. Bavier, Senior Director Hazardous Materials	- Hazardous Materials Management - Information Systems	
G.12	Review and integrate regulatory reporting systems and processes	Month 1	Month 3	R. Bavier, Senior Director Hazardous Materials	- Hazardous Materials Management - Information Systems	
G.13	Continue use of AskRail	Month 1	Month 3	R. Bavier, Senior Director Hazardous Materials	- Hazardous Materials Management - Information Systems	

HAZARDOUS MATERIALS						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
G.14	Review and integrate testing programs that evaluate compliance with operating requirements related to hazardous materials	Month 1	Month 36	R. Bavier, Senior Director Hazardous Materials	- Hazardous Materials Management - Operating Rules and Practices	

DISPATCHING OPERATIONS						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
H.1	Review dispatching rules and procedures	Pre-Closing	Month 12	J. Elliott, Director Dispatching Practices and Workforce	Dispatching	
H.2	Consolidate dispatching rules and procedures	Month 1	Month 12	J. Elliott, Director Dispatching Practices and Workforce	Dispatching	
H.3	Evaluate train dispatcher operating systems	Pre-Closing	Month 12	K. Ready, Senior Director Operations Support	- Dispatching - Information Systems	
H.4	Select primary application for train dispatcher operating systems	Month 1	Month 12	K. Ready, Senior Director Operations Support	- Dispatching - Information Systems	
H.5	Implement selected application across entire system	Month 25	Month 36	K. Ready, Senior Director Operations Support	- Dispatching - Information Systems	

DISPATCHING OPERATIONS						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
H.6	Provide training or certification as needed	Month 1	Month 36	J. Elliott, Director Dispatching Practices and Workforce	- Dispatching - Training	

HIGHWAY-RAIL GRADE CROSSING SYSTEMS						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
I.1	Review programs and practices for crossing safety and blocked crossings	Pre-Closing	Month 12	L. Wenko, Senior Manager Public Safety	Safety	
I.2	Consolidate program and implement across the combined system	Month 1	Month 12	L. Wenko, Senior Manager Public Safety	Safety	
I.3	Coordinate with authorities, as needed	Month 1	Month 36	L. Wenko, Senior Manager Public Safety	Safety	

PERSONNEL STAFFING						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
J.1	Review personnel staffing	Pre-Closing	Pre-Closing	• S. Yrkoski, General Director HRBP • R. Doerr, Vice President and Chief Safety Officer	• Labor	
J.2	Create and implement detailed personnel staffing plan consistent with number of safety-related positions to be created, transferred, or abolished per the personnel staffing review	Month 1	Month 36	• S. Yrkoski, General Director HRBP • R. Doerr, Vice President and Chief Safety Officer	• Labor	
J.3	Monitor personnel staffing and safety needs and adjust personnel staffing plan as needed	Month 1	Month 36	• S. Yrkoski, General Director HRBP	• Labor	

PERSONNEL STAFFING						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
				R. Doerr, Vice President and Chief Safety Officer		

CAPITAL INVESTMENTS						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
K.1	Maintain investments in safety and continue leveraging data to identify opportunities for future investments	Month 1	Month 36	D. O'Hara, General Director of Operating Practices	Safety	

INFORMATION SYSTEMS COMPATIBILITY						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
L.1	Review information systems and operations	Pre-Closing	Control Date	K. Sanders, Assistant Vice President Operations Technology	Information Systems	See Amended App. Vol. II at 933–957.
L.2	Coordinate and integrate IT policies	Month 1	Month 36	K. Sanders, Assistant Vice President Operations Technology	Information Systems	
L.3	Integrate information systems	Month 1	Month 36	K. Sanders, Assistant Vice President Operations Technology	Information Systems	
L.4	Monitor success of integration and promptly address any issues	Month 1	Month 36	K. Sanders, Assistant Vice President Operations Technology	Information Systems	

INFORMATION SYSTEMS COMPATIBILITY						
Item	Description	Estimated Start	Estimated Completion	Accountability	Resource Allocation	Comments
L.5	Perform comprehensive testing and validation of integrated system	Month 1	Month 36	K. Sanders, Assistant Vice President Operations Technology	Information Systems	
L.6	Train key stakeholders on information systems	Month 1	Month 36	K. Sanders, Assistant Vice President Operations Technology	Information Systems	