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Office of Chief Counsel
October 27, 2026
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Public Record

October 27, 2026

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-001

Re: *Union Pacific Corporation And Union Pacific Railroad Company—Control—Norfolk Southern Corporation And Norfolk Southern Company, FD 36873*

Dear Chief:

Attached for e-filing is the First Set of Interrogatories and Requests for Production by the City of Decatur, Illinois in the above-referenced proceeding.

Please do not hesitate to contact me if you require additional information.

Sincerely,

/s/ Charles A. Spitulnik
Charles A. Spitulnik

Enclosure

BEFORE THE
SURFACE TRANSPORTATION BOARD

FINANCE DOCKET NO. 36873

UNION PACIFIC CORPORATION AND UNION PACIFIC RAILROAD COMPANY
—CONTROL—
NORFOLK SOUTHERN CORPORATION AND NORFOLK SOUTHERN COMPANY

FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION BY THE CITY OF DECATUR, ILLINOIS

Pursuant to the Surface Transportation Board's ("STB") rules governing discovery, 49 C.F.R. Part 1114, and in accordance with the definitions and instructions set forth herein, the City of Decatur, Illinois ("the City" or "Decatur"), by its undersigned counsel, submits the following First Set of Interrogatories and Requests for Production to you the Applicants, as that term is defined below, to answer. Pursuant to 49 C.F.R. § 1114.26(a), the City requests that the responses to this First Set of Interrogatories and Requests for Production be produced within 15 days after the date of service hereof to undersigned counsel for the City.

DEFINITIONS

As used herein, the terms listed below have the following meanings ascribed to them:

1. "All" or "any" shall mean "any and all" and shall be inclusive.

2. "Applicants" or "you" or "your" means Union Pacific Railroad Company, Union Pacific Corporation, Norfolk Southern Corporation, and Norfolk Southern Railway Company and their consultants, contractors, or subcontractors and their present and former parents, subsidiaries, and affiliates, predecessors and successors, and present and former officers, directors, employees, partners, agents, representatives and other persons acting or purporting to act on their behalf.

3. "Application" means the application submitted by the Applicants in this proceeding.

4. "City of Decatur" means the City of Decatur located within Macon County, Illinois

and its affiliates, predecessors and successors, and present and former officers, directors, employees, partners, agents, representatives and other persons acting or purporting to act on its behalf.

5. "Decatur Facility" means the Norfolk Southern facility located in the City of Decatur, Illinois, sometimes referred to as the "Decatur Terminal" or "Decatur Yard."

6. "Document(s)" means all written, electronic, or printed matter of any kind, including the originals and all nonidentical copies, whether different from the originals by reason of any notation made on such copies or otherwise, including, without limitation, correspondence, memoranda, emails, text messages, notes, diaries, statistics, letters, telegraphs, minutes, agenda, contracts, reports, studies, checks, statements, receipts, returns, summaries, transcripts, pamphlets, books, prospectuses, inter-office and intra-office communications, offers, notations of any type of conversation (including, without limitation, telephone conversations or meetings), bulletins, computer printouts, teletypes, data compilations, statistical analyses, telefaxes, invoices, worksheets, graphic or manual records or representations of any kind (including, without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, records and motion pictures), and electronic, mechanical or electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, records and computerized data stored in any manner), and all drafts, alterations, modifications, changes and amendments of any of the foregoing.

7. "Norfolk Southern" means Norfolk Southern Corporation and Norfolk Southern Railway Company and their consultants, contractors, or subcontractors and their present and former parents, subsidiaries, and affiliates, predecessors and successors, and present and former officers, directors, employees, partners, agents, representatives and other persons acting or purporting to act on their behalf.

8. "Person" means the plural as well as the singular, and shall include, without limitation,

any individual, firm, corporation, joint venture, company, association, partnership, business, public agency, department, bureau, board or any other form of public, private or legal entity.

9. "Purchased Services" means work, labor, or specialized assistance purchased from a third-party than performed using the Applicants' own staff and equipment.

10. "Related" means referring, relating, reflecting, containing, pertaining, indicating, showing, evidencing, describing, discussing, mentioning, computing, constituting, defining, embodying, stating, explaining, providing any information on, detailing, or in any way dealing with.

11. "Transaction" means the transactions proposed in the Application that are subject to the Surface Transportation Board's approval.

12. All railroad-related terms shall be interpreted to retain their standard rail industry meaning.

INSTRUCTIONS

1. Unless otherwise specified, these Interrogatories are limited to the time period from January 1, 2022 to and including the date of service of these Interrogatories.

2. If any Interrogatory herein cannot be responded to or complied with in full, it shall be responded to or complied with to the extent possible with an explanation as to why full compliance is not possible.

3. Each paragraph and subparagraph of an Interrogatory shall be construed independently, and no other paragraph or subparagraph shall be referred to or relied on for the purpose of limiting its scope.

4. In answering these Interrogatories, you are required to furnish under oath all information in your possession, custody or control, even if the information is in the possession of third parties. If you or any third party objects to this instruction or answers of such third parties

identified in this paragraph are not produced in response to these Interrogatories, the failure or refusal to produce such answers should be stated and declared clearly in the response to these Interrogatories so that separate subpoenas can be issued as necessary.

5. If in answering these Interrogatories, you rely on or reference any document, identify and produce that document.

6. If in answering these Interrogatories, you claim any ambiguity in interpreting the Interrogatory, or a definition or instruction applicable thereto, such claim shall not be a basis for refusing to respond, but there shall be set forth as part of the response the language deemed to be ambiguous and the interpretation chosen or used in responding to the Interrogatory.

7. Estimates or approximations should be given when precise data cannot be supplied. Any estimates or approximations should be designated as such and a statement made as to why precise data cannot be supplied.

8. The source, sources, or basis of each answer to the Interrogatories should be separately set forth and identified, unless the person signing the answers to these Interrogatories under oath knows of his or her own personal and direct knowledge of the facts or information forming the basis of all answers given. If a particular source is an individual, that individual's full name, phone number, address, and job title should be provided. In addition, each person who is an employee, officer, director, agent, contractor, or consultant for one or more of the Applicants and who has knowledge of the matter addressed in an answer to each Interrogatory, if that person is not already identified in response to the first sentence of this Instruction, should be identified.

9. These Interrogatories are continuing in nature. Any information obtained subsequent to the service of answers to these Interrogatories that would have been included in the answers had the information been known shall promptly be supplied by supplemental answers

whenever you find, locate, acquire or become aware of such information. Supplemental answers are to be served as soon as reasonably possible after receipt of such information.

10. If a claim of privilege (including, but not limited to, the work-product privilege) is asserted in objecting to any means of discovery or disclosure, you shall comply with the requirements of 49 C.F.R. Part 1114, and identify with respect to the information: (i) the general nature of the information withheld; and (ii) the specific privilege claimed.

INTERROGATORIES AND REQUESTS FOR PRODUCTION

1. Provide the following information for Norfolk Southern's employees at the Decatur Facility (A sample table format to use for the information requested is provided below):

   a. The number of full time and part time employees in each department as well as each employee's job classification (meaning the type of labor, consistent with the categories used in the Applicants' Employee Impact Exhibits, UP-83/NS-81, FD 36873 (filed July 27, 2026)), or, alternatively, confirmation of whether the employment data provided in the Highly Confidential filings are Full Time Equivalent (FTE);

   b. Compensation to each employee by department and job classification, including fully loaded payroll (i.e., wages and salaries, wage supplements, and payroll taxes); and

   c. For each department and job classification, how many of these employees live within the City of Decatur.

Employment, Salaries, and Wages				
Department	Job Classification	Number of Full Time and Part Time Employees	Average Annual Employee Compensation ($)	Percentage of Workforce in City of Decatur
e.g., 'Mechanical'				

2. For all job classifications identified in response to Interrogatory #1, identify the standard shift or on-duty time(s) and the day(s) of the week on which the job is regularly scheduled to operate.

3. For all departments at the Decatur Facility, including those listed in response to Interrogatory #1, that use Purchased Services, state (1) the types of Purchased Services used, (2) the amounts spent, (3) the percentage of those Purchased Services purchased from local businesses based within the City of Decatur, and (4) and the names of those local businesses and the amounts paid to each. A sample table format for the information requested is provided below.

Purchased Services				
Department	Types of Purchased Services	Value of Purchase ($)	Percentage from Businesses based within City of Decatur	Name of City of Decatur Businesses and Annual Dollar amount Paid to Each (if applicable)
e.g., 'Mechanical'				

4. State whether operations and maintenance for freight handling and storage at the Decatur Facility are conducted by Norfolk Southern employees or by third parties.

a. If the operations and maintenance discussed in response to Interrogatory #4 are conducted by Norfolk Southern employees, provide the job classifications of those employees. If by third parties, state whether Norfolk Southern employees are

involved with supporting said operations and maintenance.

5. Provide all documentation describing the methodology used to calculate Applicants' estimates of anticipated workforce changes and the distinction between baseline and optimized operations described in the Application.

6. Provide the following information with regard to the Decatur Facility:

   a. For each change in employment by job type identified in the Applicants' Employee Impact Exhibits, UP-83/NS-81, FD 36873 (filed July 27, 2026), provide a corresponding estimate of employee compensation, identify the number of affected positions currently held by employees living within the City of Decatur, and state whether any employment levels or positions are guaranteed by Norfolk Southern.

   b. Identify any anticipated changes in suppliers, purchasing volumes, expenditures, or the proportion of purchases or Purchased Services from businesses located within the City of Decatur, and state whether existing suppliers are expected to continue supplying the Decatur Facility in proportions consistent with the baseline operations data requested herein.

   c. Describe anticipated changes in employment and the related policies for hiring, relocation, or position elimination when it comes to the treatment of local (meaning residents the City of Decatur) versus commuting workers (those residing outside the City of Decatur).

7. With regard to the table in Applicants' Employee Impact Exhibits, UP-83/NS-81, FD 36873 (filed July 27, 2026), state whether the sub-columns labelled as "1," "2," and "3" refer to the (1) Base Plan, (2) Optimized Plan, and (3) Growth Plan.

8. Provide the following tax documentation and information for Norfolk Southern for calendar years 2019 - 2025:

a. Illinois state and Macon County Property tax bills, specifying whether these bills include state assessed properties;

b. Illinois state income pax payments; and

c. Illinois state sales tax payments.

9. Provide all condition and inspection reports for all railroad bridges located within the city limits of the City of Decatur owned by Norfolk Southern, including but not limited to the structures listed below:

a. Brush College Road - South Bridge (located at 39.858609, -88.897957);

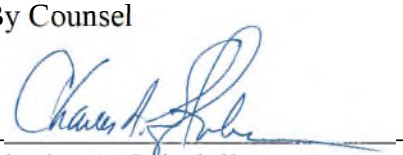
b. Brush College Road - North Bridge (located at 39.859182, -88.897965); and

c. Norfolk Southern Lake Decatur Bridge (39.86280926676734, -88.87990262199287).

10. Provide all documentation regarding the current volume and throughput of poisonous-by-inhalation (PIH) and toxic-by-inhalation (TIH) hazardous materials travelling on trains operated by Norfolk Southern through the city limits of the City of Decatur, and explain how the Applicants expect these figures to change in the Base, Optimized, and Growth Plans.

Respectfully Submitted,

CITY OF DECATUR, ILLINOIS
By Counsel



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Date: October 27, 2026

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of October 2026, I caused the foregoing First Set of Interrogatories and Request for Production by the City of Decatur, IL to be served on all parties of record in this proceeding.

Dated: October 27, 2026

By: */s/ Charles Spitulnik*
Charles Spitulnik
Partner
Kaplan Kirsch LLP

cc: All Parties of Record (via email or first-class mail)