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October 29, 2026

Chairman Patrick J. Fuchs
Vice-Chair Michelle A. Schultz
Members Karen J. Hedlund and Richard J. Kloster
Surface Transportation Board
395 E. Street, S.W.
Washington, DC 20423

RE: DOCKET FD 36873 Proposed merger between the Union Pacific (UP) and Norfolk Southern (NS) Railroads

Dear Chairman Fuchs, Vice-Chair Schultz, and Members Hedlund and Kloster:

The Pacific Northwest Waterways Association (PNWA), opposes the proposed merger between the Union Pacific (UP) and Norfolk Southern (NS) Railroads. On behalf of PNWA, I write to urge the Surface Transportation Board (STB) to very carefully evaluate the proposed merger's impacts on rail competition, shipping costs to customers, reliability of rail service, and market access for Pacific Northwest ports, shippers, and customers. Following evaluation, it seems the obvious conclusion would be to deny the merger.

PNWA has over 150 members, including ports, barge companies, steamship operators, grain elevator operators, agricultural producers, electric utilities, irrigation districts, and union labor throughout Washington, Oregon, and Idaho. Our association supports projects to advance and protect the region's navigation infrastructure, freight mobility, economic health, and the environment. We support the region's multi-modal transportation system, which provides safe, efficient, and reliable links to competitive domestic and world markets. Burlington Northern Santa Fe (BNSF) railroad is one of our valued members.

Competition Ensures Better Rates Not Consolidation

As we understand it, our country is already served by a transcontinental railroad and this merger would concentrate market share giving one company unprecedented power to control prices and disrupt current supply chains. Given the challenges we have seen following the COVID-19 pandemic and adjustments to supply chains due to tariffs and other trade policies, this would be one more shock to the system. If the UP and NS merger is allowed to proceed, then the combined railroad would carry almost half of the nation's rail cargo. This advantage would allow UP and NS to hold many shippers captive.

In addition, the Pacific Northwest is concerned about the UP and NS mega-railroad focusing on maximizing routes to serve California, the Southwest, and Gulf regions which could be highly impactful to ports, shippers, and customers in the Pacific Northwest. This could be especially problematic for the agricultural industry in the Pacific Northwest if the availability of

refrigerated cars for perishable products are tied up in other regions of the country and not able to service the Pacific Northwest region. Likewise, Pacific Northwest manufacturers may see supply chain disruptions if their suppliers are held captive by the monopolistic UP and NS mega-railroad's prices and an inability to ship parts and components.

Preserve Competition Among the Class 1 Railroads

It is in the public interest to have more than one Class I railroad. Having more than one Class 1 railroad is vital to ensure Pacific Northwest and West Coast shippers, ports, and producers remain competitive globally.

Better service and favorable prices come from competition between multiple railroads. While the rail networks of UP and BNSF serve different cities, having multiple options allows shippers to utilize different routes to serve different destinations. There is also some overlap in the UP and BNSF networks which provides critical redundancy, particularly in case of emergencies. It is imperative to the Pacific Northwest that these benefits are maintained and to ensure both the BNSF and UP railroads can maintain service levels that support competitiveness and reliability of rail service options in the Pacific Northwest.

Conclusion

PNWA urges the STB to encourage investment and cooperation with the Class I railroads rather than consolidation and creation of monopolies. PNWA appreciates the full and fair consideration of our comments and concerns and urges the STB to deny the merger between the Union Pacific (UP) and Norfolk Southern (NS) Railroads to ensure robust competition among the Class I railroads.

Please feel free to contact me at neil.maunu@pnwa.net or 360-251-0607.

Respectfully submitted,



Neil Maunu
Executive Director
Pacific Northwest Waterways Association

CC: Parties of Record