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Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: Finance Docket 36946, Alameda Belt Line—Operation Exemption—Board of Harbor Commissioners of the Port of Los Angeles, Board of Harbor Commissioners (Long Beach), Alameda Corridor Transportation Authority, and Union Pacific Railroad Company

Dear Chief of Case Administration:

Union Pacific Railroad Company respectfully submits this letter to provide additional information that may be useful to the Board as it considers the pending notice of exemption in the above-captioned matter.

Union Pacific is one of the two Class I railroads serving the critical Ports of Los Angeles and Long Beach (the "Ports"), and as such Union Pacific has a keen interest in efficient operation of the Ports' terminal facilities. For this reason Union Pacific supported the decision of the Ports to begin an open competitive bidding process for a terminal operator after decades of no-bid awards to the incumbent Pacific Harbor Belt ("PHL"). The Ports concluded that process by choosing Alameda Belt Line ("ABL") as the winning bidder, and the Ports and ABL are in the midst of a careful process to transition all rail operations as of January 1, 2027.

As ABL explained in its October 13, 2026 Reply to PHL's request for a stay, ABL and the Ports are planning a two-step transition in which port terminal maintenance, dispatching, and train control operations will transition on December 3, 2026, and ABL operations will commence on January 1, 2027.[1] Other agreements are also being finalized to facilitate a smooth transition. For example, on October

[1] Verified Reply of Alameda Belt Line in Opp'n to Request for Housekeeping Stay, at 4, Fin. Docket 36946 (filed Oct. 13, 2026).

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29, 2026, Union Pacific and ABL finalized lease agreements under which ABL will assume operations of the Carson Industrial Lead and the Santa Ana By-Pass (collectively, the "Drill Tracks") that are presently operated by PHL via lease agreements. PHL elected to terminate those agreements with Union Pacific, effective December 31, 2026, while simultaneously attempting to delay the Board's authorization to replace PHL with ABL. These agreements continue forward progress on the carefully considered operator transition plan.

Union Pacific does not take any position on the multiple recent filings in this docket, except to express Union Pacific's strong support for a smooth transition of operations to the terminal operator that the Ports have selected. It is now less than five weeks until the planned transition of port terminal maintenance, dispatching, and train control operations, and all parties would benefit from certainty and finality. Union Pacific encourages the Board to complete its review expeditiously, to lift the housekeeping stay, and allow ABL, the Ports, and line-haul railroads to continue the careful transition of operations to the Ports' chosen operator.

Respectfully submitted,

/s/ Matthew J. Warren

Matthew J. Warren

Counsel for Union Pacific Railroad Company

cc: Parties of Record