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STUART L. WHITT

September 21, 2026

Elizabeth Webster
Surface Transportation Board (Docket No. FD 36873)
395 E Street SW
Washington, DC 20423

RE: Docket No. FD 36873, Union Pacific Corporation and Union Pacific Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company; Preliminary Consultation

Dear Ms. Webster:

The undersigned represents the Board of Education of Oswego Community Unit School District 308, located in Kane, Kendall, and Will Counties, Illinois ("School District 308"). The intent of this correspondence is to submit comments to the Office of Environmental Analysis on the subject matter of the above referenced Docket No. FD 36873.

School District 308 is a public school district operating under provisions of the School Code of Illinois. (105 ILCS 5/1-1 *et seq.*) School District 308 provides public education services to students from pre-Kindergarten through grade 12 (up to age 22). District 308 has a current enrollment of approximately 17,000 students, many of whom ride District-provided school buses to and from school.

School District 308 is concerned that the acquisition described in Docket No. FD 36873 will adversely affect the District and its students who are bused to and from school in the following ways, particularly during the peak bus times each morning and afternoon:

1. The proposed merger projects a significant increase in freight traffic volume and gross ton miles across combined corridors. If freight routes increase through District 308's service area during its peak AM and PM periods, it will lead to bus route bottlenecks, increased travel times, and delays across multiple tiers, especially in the afternoon.

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2. If there is a high volume of freight traffic through the School District, some school bus routes may have to be rerouted, increasing student travel times, late buses, and increased fuel consumption.

3. Public school buses are required to execute a full safety stop at all railroad crossings. If rerouting buses is not an option, District 308 is concerned about the amount of time it will take for buses to clear a railroad crossing, increasing student travel times, late buses, and increased fuel consumption.

For these reasons, School District 308 is very concerned about the adverse impact the proposed merger may have on the District's daily transportation of students to and from school. If the Office of Environmental Analysis or Surface Transportation Board would like to receive more information on District 308's daily student transportation volume, routes, specific local rail crossing vulnerabilities, and the potential operational and safety impacts the proposed merger will have on the District and its students, we will provide it.

On behalf of District 308, we thank you for your consideration of these comments and concerns.

Very truly yours,

WHITT LAW LLC

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