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Before the

SURFACE TRANSPORTATION BOARD

Finance Docket No. FD 36873

UNION PACIFIC CORPORATION AND UNION PACIFIC RAILROAD COMPANY - CONTROL – NORFOLK SOUTHERN CORPORATION AND NORFOLK SOUTHERN RAILWAY COMPANY

RESPONSE FOR CONDITIONS ON BEHALF OF THE CANTON RAILROAD COMPANY

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November 12, 2026

In accordance with the Board's Decision No. 30 served in this proceeding on August 18, 2026, Canton Railroad Company ("CTN") submits this requests for conditions in this matter.

Background

Canton Railroad Company, established in 1906, is a historic short-line railroad that functions as a logistics partner with customers in and around the Port of Baltimore. Canton operates as a Class III switching and terminal railroad, serving as the essential "last mile" link between two national rail networks and specific industries within the Port of Baltimore. Canton's core message is that it delivers safe, reliable, and efficient short-line rail service that connects industries to global markets through the Port of Baltimore. Canton Railroad Company was acquired by the State of Maryland through the MDTA (Maryland Transportation Authority) in 1987 to preserve critical rail access to the Port of Baltimore's Seagirt Marine Terminal for both CSX and Norfolk Southern (NS).

RESPONSIVE APPLICATION

CTN asks the Board to condition any approval of the proposed acquisition of Norfolk Southern Corporation and Norfolk Southern Railway Company (NS) by

Union Pacific Corporation and Union Pacific Railroad Company (UP) upon the granting of trackage rights and interchange requests over the following NS lines;

1. Trackage Rights from NS Bayview Yard to Tradepoint Railroad (TPRR)—NS mileposts GK 0.0 to GK 5.7--for traffic to/from CTN and Seagirt Marine Terminal (Port of Baltimore) to/from Tradepoint Rail's interchange at Grays Yard (MP GK 5.7). This stretch of track is commonly referred to as the Sparrows Point Industrial Track or the GK Line.
    a. The right to interchange railcars directly with the Tradepoint Railroad in Grays Yard at Sparrows Point something which is not currently permitted by NS.

2. Trackage rights from NS Bayview Yard to Dundalk Marine Terminal-NS mileposts IP 0.0 to IP 1.05, BV 1.30 to BV 5.40—for traffic to/from CTN (CSX traffic) to/from the Dundalk Marine Terminal complex. This stretch is track from Bayview Yard to Dundalk Marine Terminal is commonly referred to as the Bear Creek Running Track or the IP and BV Lines.

    a. The right to switch CTN and CSX railcars within the Dundalk Marine Terminal complex something which currently is denied CTN by NS.

These trackage rights and interchange rights would provide for much better service to customers within the Port of Baltimore served by CTN. It would also provide for more reasonable rates for rail cars moving in the Port of Baltimore and would result in less trucks and more rail cars serving customers in the Port. The granting of the trackage and interchange rights would therefore serve the public interest.

Respectively Submitted

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CERTIFICATION

I hereby certify that on November 12, 2026 **the foregoing document was served by first class mail or email upon all parties of record on the service list and the administrative law judge assigned to this proceeding.**

/s/John K. Fiorilla