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BEFORE THE SURFACE TRANSPORTATION BOARD

Docket No. FD 36873

Union Pacific Corporation and Union Pacific Railroad Company—Control—Norfolk Southern Corporation and Norfolk Southern Railway Company

Comments of the Illinois Farm Bureau

November 13, 2026

The Illinois Farm Bureau (IFB) submits these comments opposing Union Pacific's proposed acquisition of Norfolk Southern.

IFB is a statewide membership organization representing over 70,000 farmers throughout Illinois. Illinois agriculture depends on a competitive, reliable, and resilient freight transportation system to move grain, oilseeds, biofuels, processed agricultural products, and livestock feed ingredients and to receive fertilizer and other essential farm inputs.

IFB shares American Farm Bureau Federation's concerns that the proposed acquisition of Norfolk Southern by Union Pacific would further consolidate an already highly concentrated freight rail industry, reduce transportation choices, and expose farmers and agricultural businesses to higher costs and greater service risks.

Under the Surface Transportation Board's major-merger standards, the applicants must demonstrate that the proposed transaction would enhance competition and serve the public interest. IFB does not believe the current record establishes that the claimed efficiencies and public benefits outweigh the transaction's risks to competition, service, and agricultural supply-chain resilience.

Many agricultural shippers are served directly by only one railroad and depend on competition elsewhere in the rail network to provide routing options and help constrain rates. Further consolidation could reduce those options and weaken competitive pressure on rates and service.

Rail transportation demand for agricultural commodities is relatively inelastic. Grain must move to domestic processors, livestock operations, and export markets. Fertilizer and feed ingredients must arrive within narrow seasonal and production windows. When rates increase, or service deteriorates, farmers often cannot reduce shipments or readily switch to another mode. Instead, increased transportation costs are reflected in weaker local basis levels, higher input costs, and tighter farm margins.

IFB supports practical and enforceable measures that preserve or expand meaningful rail competition. Any proposed protection or condition should be evaluated based on whether it provides reliable and economically usable service—not merely theoretical access.

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Reliable service is also essential because agriculture operates on biological, seasonal, and market-driven schedules. Grain movement after harvest, fertilizer delivery before planting, feed delivery to livestock operations, and shipments to processors cannot simply be postponed without consequences.

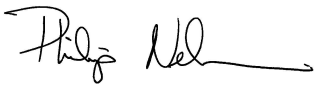
Past rail mergers demonstrate that promised efficiencies do not always prevent significant integration problems. Once competition is eliminated, it cannot easily be recreated after rates rise, service declines, or a shipper loses access to a commercially useful route.

Applicants' projections of increased efficiency, truck-to-rail diversion, and shipper savings should therefore be supported by transparent evidence and enforceable commitments. General promises of future growth or improved service are not an adequate substitute for competition.

IFB respectfully requests that the Board deny the proposed transaction because the applicants have not demonstrated that it will enhance rail-to-rail competition or adequately protect agricultural shippers from increased concentration, higher rates, and service risks. Illinois agriculture needs more effective rail competition, not fewer independent options.

If the transaction is approved, the Board should impose strong, measurable, and enforceable conditions that preserve competition, protect service, and provide meaningful remedies for agricultural shippers.

Respectfully submitted,



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Certificate of Service

I hereby certify that on November 13, 2026, a true and correct copy of the foregoing Comments of the Illinois Farm Bureau was served upon all parties of record in STB Docket No. FD 36873, the Secretary of Transportation, the Attorney General of the United States, and Administrative Law Judge Jenifer Soulikias, by electronic mail to recipients who accept electronic service and by first-class mail, postage prepaid, to the remaining recipients.

/s/ Rodney Knittel

