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Surface Transportation Board

395 E Street SW

Washington, DC 20423

Docket FD 36873, Support for the Proposed Union Pacific–Norfolk Southern Merger UPRR/NS Merger Endorsement

Members of the Board:

I serve as SMART-TD State Safety and Legislative Director for Nebraska, representing approximately 800 Union Pacific railroad employees. I support approval of the proposed Union Pacific/Norfolk Southern merger, provided it includes meaningful safety protections, accountability, and appropriate regulatory oversight. My 23 years of railroad experience as a conductor have given me firsthand knowledge of the operational challenges, safety responsibilities, and risks associated with moving freight across our nation's rail network.

Connecting Union Pacific's western network with Norfolk Southern's eastern network presents an opportunity to reduce interchange delays, improve network efficiency, and provide shippers with faster, more reliable service. It also creates an opportunity to shift additional freight from our highways to the rail system, improving safety for the public. This is particularly important in Nebraska, where I-80 serves as one of the nation's major east-west transportation corridors and carries significant volumes of commercial truck traffic through the middle of our state. Moving more freight by rail has the potential to reduce highway congestion, decrease the number of heavy trucks on our roads, and improve transportation safety. Increased efficiency and faster service, however, must never come at the expense of safety. Every additional shipment transported by rail has the potential to reduce the number of heavy commercial trucks traveling on our state's already congested highways, reducing exposure to roadway accidents and improving safety for the motoring

public. This is especially important in Nebraska, where commercial truck traffic places significant demands on our highway infrastructure. From my perspective, this merger has the potential to strengthen Nebraska's economy while providing long term benefits to railroad employees, shippers, and the communities we serve.

Just as important, a merger of this magnitude must recognize that safe and reliable railroad operations depend on experienced, properly trained, and adequately staffed employees. Safety cannot be achieved through operational efficiency. It requires qualified employees who understand the territory, operating rules, equipment, and the communities through which they operate. Adequate staffing, proper training, effective communication, and sufficient time to perform safety critical responsibilities must remain priorities throughout the merger process.

I strongly encourage the Board to make safety a central consideration in its review and approval of this proposed merger. Approval should include meaningful safeguards and ongoing oversight addressing employee safety, adequate staffing, training, service reliability, infrastructure capacity, emergency response, and the impact on the communities served by these railroads. The Board must also ensure that promised efficiencies do not result in increased workloads, compromised safety practices, or reduced resources necessary to operate safely.

I ask the Board to approve the proposed merger with appropriate safeguards and accountability. With the protections provided by meaningful regulatory oversight, this merger presents an opportunity to build a stronger, more efficient national rail network while retaining the experienced railroad employees who make safe operations possible.

A successful merger should not be measured by speed, cost savings, or operating efficiency alone. It must also be measured by its commitment to protecting employees, the public, and the communities that depend on our nation's rail transportation system. Safety must remain the foundation of every operational decision.

I certify that I have this day served copies of this document upon all parties of record in this proceeding, by email to those parties who have accepted email service and by first-class mail to all others, consistent with 49 C.F.R. § 1104.12(a).

Respectfully,



Andrew Foust

SMART-TD, Nebraska Safety and Legislative Director

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