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November 17, 2026

Surface Transportation Board

395 E Street SW

Washington, DC 20423

RE: Docket FD 36873, Support for the Proposed Union Pacific–Norfolk Southern Merger

Members of the Board:

I serve as SMART Transportation Division's State Safety and Legislative Director for Iowa, representing nearly 500 Union Pacific members and 7 Norfolk & Southern members. I support approval of the proposed Union Pacific–Norfolk Southern merger. My 21 years of railroad experience as a conductor and engineer have given me the perspective to make this endorsement with confidence.

Connecting UP's western network with NS's eastern network offers an opportunity to reduce interchange delays and give shippers faster, seamless service. That kind of service will also attract freight now moving by truck on our highways. (Identify a corridor, terminal, industry, or business in your state where improved service could help, and explain how faster rail service would support it.) From my perspective, this merger will economically benefit the people of (State) as well as its railroaders.

Moving freight from highways to rail is also a safety benefit for the national transportation network. Every shipment that shifts to a train means fewer heavy trucks on crowded roads and highways. With less heavy traffic, commuter transportation networks will have a longer lifespan saving on needed tax expenditures.

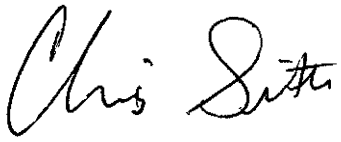
Delivering faster service requires sufficient staffing. SMART-TD's Jobs for Life agreement protects covered railroaders and their crafts throughout their careers if this merger is approved and completed. That keeps experienced railroaders on the job who know the territory, the operating rules, and the customers, and who can expedite recovery of service when operations don't go as planned.

Given recently released videos, customer protections need a through review. Without customers to serve, business with dimmish. Longer, larger, and heavier trains lead to blocked crossings causing service interruptions to the most basic needs. The railroads, regardless of class and size need to maintain public safety to a very stringent standard.

I ask the Board to approve the proposed merger with appropriate safeguards and oversight addressing safety, service reliability, blocked crossings, shipper access, customer protections, and community impacts. Approval of this merger, along with the SMART-TD

agreement that accompanies it, will deliver a railroad that serves shippers faster and more reliably while keeping trained railroaders on our locomotives.

In Solidarity,



Chris Smith

SMART Transportation

Iowa Safety and Legislative Director

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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).

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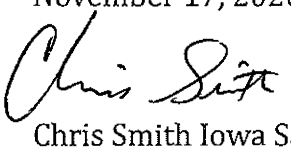

Chris Smith Iowa Safety and Legislative Director