SMART Transportation Division
California Safety and Legislative Board
717 K Street #222 • Sacramento, CA 95814
Phone: 916-441-2051 • cslb@ca-smart-td.org

Louie Costa
Safety and Legislative Director

312908

ENTERED
Office of Chief Counsel
November 17, 2026
Part of
Public Record

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 (SMART-TD) Safety and Legislative Director for California, representing about 1000 members currently working on the Union Pacific Railroad. On behalf of the nearly 10,000 active and retired California members of SMART-TD, I support approval of the proposed Union Pacific-Norfolk Southern merger. My 29 years of railroad experience as a conductor 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. Shippers in California (such as those moving goods straight from Southern California ports like Los Angeles and Long Beach) would gain direct, single-line rail connectivity all the way to New York City and the American Southeast without switching rail lines mid-journey. The revised merger framework includes dedicated daily premium intermodal lanes, such as a direct lane connecting Northern California to the Southeast. From my perspective, this merger will economically benefit the people of California 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 California's notoriously congested freeways the more freight that can be shipped via rail will help reduce congestion and provide for cleaner air in our communities.

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.

I ask the Board to approve the proposed merger with appropriate safeguards and oversight addressing safety, service reliability, shipper access, 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,



California Safety and Legislative Director

Cc: Parties of Record

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).

11/17/2026 Louie Costa California State Safety and Legislative Director