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Hub Group writes in support of the proposed combination of Union Pacific and Norfolk Southern because it directly aligns with how Hub has built and grown its business. Hub is one of North America's largest intermodal marketing companies and an asset-based logistics provider, serving customers across intermodal, truck brokerage, dedicated capacity, refrigerated, automotive, retail, consumer goods, and Mexico cross-border markets. With one of the industry's largest private 53-foot container fleets, Hub has long relied on strong rail partnerships to convert highway freight to intermodal and deliver scalable, reliable transportation solutions for its customers.

For many years, Hub has aligned its western rail network with Union Pacific and its eastern rail network with Norfolk Southern. Today, roughly 40% of Hub's rail traffic interchanges between the two carriers, making Hub uniquely positioned to benefit from a more seamless transcontinental rail network. That history and traffic profile make this transaction especially meaningful for Hub as a practical opportunity to strengthen service, expand market reach, and grow rail volumes in lanes where interline complexity limits today's opportunity.

Hub views the proposed Union Pacific and Norfolk Southern combination as a clear growth platform. A single-line transcontinental service offering would allow Hub to present customers with a simpler, more competitive rail solution across key long-haul and watershed markets. By reducing handoffs, improving consistency, and creating one accountable rail partner from origin to destination, the combined network would help Hub compete more effectively for incremental truckload freight and support continued expansion in strategic customer segments.

Hub expects the combination to create three primary growth benefits:

- Expanded truck-to-rail conversion opportunities by offering customers a faster and more reliable coast-to-coast intermodal product.
- Improved access to new and existing growth markets through a unified operating plan across Union Pacific's western network and Norfolk Southern's eastern network.
- A stronger customer value proposition built around consistent service, better visibility, simplified execution, and one accountable rail partner.

This combination would give Hub a more compelling platform to grow with existing customers, pursue new business, and shift more freight from congested highways to rail. Hub's long-standing relationships with both Union Pacific and Norfolk Southern, its significant interline traffic between the two networks, and its scale as a major asset-based intermodal provider make the benefits of this transaction tangible and specific. Hub Group believes the proposed combination will make rail a more competitive growth solution for shippers across North America, and we are pleased to support it.



Phillip D. Yeager
President, Chief Executive Officer & Vice Chairman
Hub Group, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2026, I served a copy of the foregoing comments of Hub Group, Inc. in Finance Docket No. 36873 upon all Parties of Record in this proceeding by electronic mail.



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