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Office of Chief Counsel
November 18, 2026
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Public Record

Members of the Surface Transportation Board
Washington, D.C.

Re: Support for the Proposed Union Pacific–Norfolk Southern Merger

Dear Members of the Board:

On behalf of the railroad workers represented by our organizations, we write in support of the proposed Union Pacific–Norfolk Southern merger. Our support rests on a clear principle: a stronger railroad must deliver a stronger future for the people whose work makes it possible. The career-long employment commitments we have negotiated make this transaction an opportunity to address insecurities that have followed railroad families for generations.

Beginning with SMART-TD, the nation's largest railroad union and the first to secure a Jobs for Life agreement, our organizations have brought the concerns of frontline workers to the bargaining table. Each has pursued protections responsive to the crafts and employees it represents. Together, we have made workers' careers and families central to the discussion of this merger.

Railroading has long been a bellwether of the American economy. Our members move the raw materials that feed factories, and the finished goods those factories produce. They handle imports, exports, agricultural products, energy, and the everyday necessities that sustain communities. Domestic and international pressures reach our industry from virtually every direction. For railroaders, those pressures determine whether a terminal needs 10 crews or two, whether a shop has steady work, and whether a family can count on its next paycheck.

What economists describe as a change in global demand quickly becomes a conversation at a railroader's kitchen table. A factory slows production. Orders fall. Freight disappears. Families begin asking how long the work will last. When business recovers, a headline announcing that a plant has reopened does not immediately restore every railroad assignment. Workers must wait for orders, production, and shipments to rebuild. Too often, railroad families are among the first to feel a downturn and are still waiting for dependable work after the recovery has begun in other business sectors.

For generations, railroaders have answered that uncertainty by chasing work. They follow their seniority to another terminal, sometimes hundreds or thousands of miles away. They learn unfamiliar territory and live in hotels, campers, or any temporary quarters available. They spend weeks away from the homes they are trying to keep and the families they are working to support. Others face pressure to change crafts to preserve their income, health coverage, and continued service toward Railroad Retirement, familiar experiences across Union Pacific and Norfolk Southern.

Our members also know who usually absorbs the consequences when a business plan falls short. The frontline employee faces the furlough notice, the displacement, or the decision to uproot a

family. Workers have too often been expected to carry the risk of decisions they nor their families made.

Today, automation adds another layer of uncertainty. Employees who have invested years in demanding, skilled careers should not have to assess every new system or piece of equipment by calculating whether it will eliminate their livelihood before they can reach retirement. Technological progress should improve safety and service while giving the people who built this industry a fair opportunity to finish their careers with dignity each of our members has earned.

The Jobs for Life agreements change that calculation. Their central achievement is career-long employment security for covered workers who meet the eligibility requirements and employment dates specified in their respective agreements, subject to the usual requirements for continued employment. That protection allows families to plan beyond the next low traffic cycle or operational change. It gives our brothers and sisters a secure path toward retirement.

The substance of that security matters. SMART-TD has secured lifetime protection against involuntary furlough for covered employees, **in their crafts**, under their collective bargaining agreements and within their current seniority districts. ATDA has secured lifetime employment as ATDA train dispatchers, protection for represented dispatching work, a minimum five-year commitment to Atlanta and substantial advance notice of any subsequent relocation. The Carmen, Boilermakers, Firemen and Oilers, SMART-MD and USCA have likewise secured employment commitments for the workers they represent. The specific terms differ, but the shared purpose is clear: protect railroad careers and give families greater stability. While known as “Jobs for Life,” the objective is more than that. What has been accomplished through our collaborative efforts is more than “a job;" it is a protected career, with the skilled work and established contractual rights that give it both meaning and dignity.

These agreements provide benefits beyond an individual household. The railroads are retaining experienced railroaders. This supports the knowledge, continuity, and skilled workforce needed for safe, reliable service. Stable employment also sustains the communities where railroad families buy homes, raise children, and spend their paychecks. Worker security deserves substantial weight in the Board’s assessment of the public interest.

We also see an opportunity to grow the work. A more seamless network, fewer interchange delays, and more dependable service can help rail compete for freight now moving by highway. Our interest is in turning that potential into additional traffic, investment, and good union jobs. **Protecting today’s employees and creating opportunities for tomorrow’s railroaders should advance together.**

We respectfully urge the Board to approve the proposed merger, with the negotiated employment commitments honored in full and effective oversight of safety, service, and implementation. Our support carries an expectation of continued labor involvement and accountability for the promises made to our members.

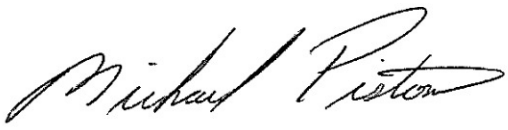
The people who keep this nation's freight moving have earned the opportunity to complete their careers under strong union agreements, support their families, and retire with dignity. This transaction offers unprecedented access to that security. We ask the Board to recognize its lasting value to railroad workers, their communities, and the American economy.

Respectfully,

Signatories — Union Pacific–Norfolk Southern Merger Support



Jeremy R. Ferguson
President, Transportation Division
International Association of Sheet Metal, Air, Rail and Transportation Workers (SMART-TD)



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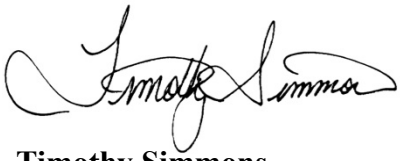


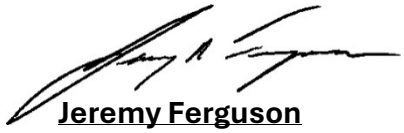
Timothy Simmons
International President
International Brotherhood of Boilermakers, Iron Ship Builders, Blacksmiths, Forgers & Helpers



Peter Kennedy
Director of Railroad, Mechanical and Engineering
International Association of Sheet Metal, Air, Rail and Transportation Workers (SMART-MD)

CERTIFICATE OF SERVICE

I certify that I have this day, Nov. 18, 2026, 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)



Jeremy Ferguson

President
SMART Transportation Division