312999
ENTERED
Office of Chief Counsel
November 18, 2026
Part of
Public Record

**BEFORE THE**
**SURFACE TRANSPORTATION BOARD**

**FINANCE DOCKET NO. 36873**
**UNION PACIFIC CORPORATION AND UNION PACIFIC RAILROAD COMPANY**
**-CONTROL-**
**NORFOLK SOUTHERN CORPORATION AND NORFOLK SOUTHERN RAILWAY COMPANY**

# PROPOSED CONDITIONS OF DEKALB COUNTY, GEORGIA

DeKalb County, Georgia respectfully submits these proposed conditions regarding the proposed combination of Union Pacific Railroad Company and Norfolk Southern Railway Company. These proposed conditions address potential impacts on DeKalb County's emergency services and public safety and incorporate feedback from Police, Fire Rescue, and Emergency Management.

## PROPOSED CONDITIONS

| Condition | Request |
|---|---|
| **Emergency Communications and Operational Coordination** | a. A proven emergency-call cutover protocol<br>b. A tested way for Omaha to stop trains during the switch, including a process for incident commanders to request and receive confirmation of an emergency train stop or movement when emergency response is affected<br>c. A stated plan for automatic 911 alerts, including whether RapidSOS, the NS system that transmits incident and cargo information directly to 911 centers, will continue after the merger<br>d. *AskRail,* the first responder app for train cargo, remains on NS's current records until the merged version is proven accurate; provide incident commanders with accurate hazardous-material car contents and locations, including a backup method if the primary information system is unavailable<br>e. DeKalb contacts confirmed in Omaha's system before that center accepts live calls<br>f. DeKalb's E911, Fire Rescue and Emergency Management, DKPD and affected municipal police departments receive at least 90 days' notice and participate in a joint drill before any emergency communication system change; the drill shall test direct railroad dispatch access, emergency train-stop requests and confirmation, hazardous-material car information and contingency or backup communications. The drill shall also test Emergency Operations Center (EOC) coordination and the application of criteria for issuing public alerts to affected communities<br>g. A direct, 24-hour 24/7 Emergency Railroad Dispatch Coordination for E911 and responding agencies, with a process to coordinate train |

| Condition | Request |
|---|---|
| | movements and clear crossings obstructing active emergency responses as soon as safely practicable |
| **Critical Crossing Program for DeKalb** | Apply UP's Houston crossing-alert practice to the 8 DeKalb crossings:<br>a. All 8 crossings are flagged on dispatcher screens<br>b. Dispatchers receive an alert when a train has blocked a crossing for 20 minutes<br>c. DeKalb E911, DKPD and affected municipal police departments are notified at 30 minutes<br>d. DeKalb E911 is notified immediately when the railroad becomes aware that a blocked crossing is affecting an active emergency response or multiple crossings in the Doraville cluster are blocked simultaneously, regardless of the 20- or 30-minute thresholds<br>e. E911 and responding agencies have a 24-hour 24/7 immediate escalation channel to railroad dispatch to request safe, prompt clearance when a blocked crossing delays an emergency response |
| **No Staging Across the Doraville Cluster** | Except in emergencies, trains aren't held or staged on the main line across Buford Highway, Gilleland Lane or Bankers Industrial Drive. |
| **Crossing-Blockage Reporting** | For 5 years after UP takes over NS, the railroad reports quarterly to DeKalb and the STB every blockage over 10 minutes at the 8 DeKalb crossings, with its duration. |
| **Hazmat Preparedness in DeKalb** | Before any merger-related increase in hazardous-material traffic affecting DeKalb County, the combined railroad provides hazardous-material commodity-flow information for the DeKalb line and Doraville yard and offers initial hazmat-response training to DeKalb Fire Rescue, Emergency Management, DKPD and affected municipal first responders. The railroad shall also participate with DeKalb Emergency Management, Fire Rescue, DKPD and affected municipal first responders in hazmat tabletop or full-scale exercises to test EOC coordination and establish criteria for issuing public alerts to affected communities |
| **Reconcile the Hazmat Figures** | a. Explain why the Doraville yard shows 4 additional hazardous-material cars per day while the DeKalb line (Segment 10023) and its northern continuation (Segment 10165) show no increase in hazardous-material carloads<br>b. File corrected figures if either table is in error<br>c. Identify which tracks carry the additional cars to the yard |

Respectfully submitted,

**DeKalb County, Georgia**

*/s/ Jennifer Fehribach*
Jennifer Fehribach
Director of Transit
Office of the CEO
DeKalb County Government

## CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Proposed Conditions of DeKalb County, Georgia has been electronically filed with the Surface Transportation Board and served on all parties of record of the proceeding by electronic mail this 18th day of November 2026.

/s/ *Jennifer Fehribach*____
Jennifer Fehribach
Director of Transit
Office of the CEO
DeKalb County Government