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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

COMMENT IN SUPPORT OF ACQUISITION

The Huntsville-Madison County Airport Authority, doing business as the Port of Huntsville ("POH"), supports the application of Union Pacific Corporation and Union Pacific Railroad Company (together, "UP") to acquire Norfolk Southern Corporation and Norfolk Southern Railway Company (together, "NS"). The North Alabama economy has been built on trade, manufacturing, agriculture, logistics, and a longstanding commitment to globally connecting businesses and communities to opportunity. Over the last several decades, the Huntsville region has become one of the nation's premier destinations for investment and growth because it has consistently strengthened the infrastructure and transportation networks that allow businesses to compete and prosper. Rail transportation remains a critical part of that success and is one of the community's leading catalysts for business and economic development. A new rail carrier that combines the networks of UP and NS would connect Huntsville to new ports across the country and thereby provide increased economic opportunities for Huntsville-area shippers.

POH Rail Operations. POH owns and operates the International Intermodal Center ("IIC"), which is a U.S. Customs port of entry and has been serving North Alabama and South Central Tennessee since 1986. Strategically located in North Alabama, the IIC specializes in the

efficient handling of international and domestic cargo, providing a centralized hub for receiving, transferring, storing, and distributing goods via air, rail, and highway operations. Located on site at the IIC are U.S. Customs and Border Protection, United States Department of Agriculture inspectors, a depot storage yard, and an independent chassis pool of 20', 40', and 45' equipment. It has capacity for 1,100 wheeled units and stacking capacity for over 500 loads, along with two 45-ton overhead gantry cranes that enable top lift, including wide top-pick capability. The existing site has the capability to handle up to 100,000 lifts per year, with minimal infrastructure investment. POH has invested more than $72 million in the IIC over the last 40 years.

Since 1986, POH and NS have partnered to provide intermodal service in the North Alabama region. The IIC is connected by a five-mile spur to NS's Memphis-Chattanooga main line, on which cargo currently travels from Huntsville primarily to East Coast ports like Savannah, Georgia, and Charleston, South Carolina, with limited service to the West Coast. Service to the East Coast service has grown in recent years. The IIC logged 33,309 rail lifts in 2025, which constituted growth of more than 10,000 lifts over the last three years.

Impacts of Merger on Huntsville and Alabama. The North Alabama market is uniquely positioned to benefit from a seamless rail network that connects the East Coast, Gulf Coast, and West Coast through a single transportation system. Greater connectivity between the IIC and western markets has the potential to strengthen supply chains, improve efficiency, and create new opportunities for Alabama importers, exporters, manufacturers, agricultural producers, and retailers.

Huntsville is approximately 200 miles from Memphis and lies within the watershed region that will most benefit from the merger of UP and NS. Shippers would no longer need to dray from Memphis to Huntsville to avoid lengthy interchanges, but could move seamlessly through the

watershed and use rail from the West Coast all the way to the IIC in Huntsville. The traffic study from UP and NS identifies the Memphis to Huntsville route as one of two in the country where long-haul drayage moves could be converted to longer rail transits across the watershed (the other route being Chicago to Detroit and Toledo). The study projects 70,000 such diversions each year across the two markets. Single-line service to the IIC could remove thousands of truckloads from Huntsville-area highways every year and allow shippers to move goods more efficiently by relying on one carrier rather than coordinating interchanges between two.

Huntsville's economic development success story has been driven by an ability to connect businesses to markets. Companies such as Toyota Alabama, Mazda Toyota Manufacturing, Nucor, and most recently Eli Lilly have chosen to invest and grow in Huntsville because of the area's workforce, business climate, and transportation infrastructure. POH creates efficient and economical solutions for customers and helps stimulate the state's economy through a strong transportation infrastructure, global connectivity, and innovative improvements. To sustain this momentum, the region's transportation network must continue to evolve to meet the needs of a growing economy. Enhanced rail connectivity and more efficient access to markets across North America would further strengthen the region's position as a destination for investment, job creation, and long-term economic growth. And as Alabama continues to grow, improved rail connectivity will help reduce congestion, improve roadway safety, and limit wear on public infrastructure.

A unified UP/NS network would strengthen freight mobility, expand POH's reach, and support economic development both in Huntsville and the greater region. POH supports the application and looks forward to connecting its customers with a new, transcontinental railroad.

Respectfully submitted,

/s/ Sean M. Grammel

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November 18, 2026

CERTIFICATE OF SERVICE

I certify that I served a copy of the foregoing document on all parties of record in this proceeding, by electronic mail or first-class mail this 18th day of November 2026.

/s/ Sean M. Grammel
Sean M. Grammel

cc: All Parties of Record (via email or first-class mail)