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SOUTHERN RAIL COMMISSION

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Before The
Surface Transportation Board

Docket No. FD 36873

Union Pacific Corporation and Union Pacific Railroad Company
-Control-
Norfolk Southern Corporation and Norfolk Southern Railway Company

Comments and Request for Conditions of the Southern Rail Commission

Knox Ross
Chairman
Southern Rail Commission

November 18, 2026
The Honorable Patrick J. Fuchs
Chairman, Surface Transportation Board
395 E Street SW
Washington, DC 20423

RE: Comments and Request for Conditions of the Southern Rail Commission Regarding the Proposed Union Pacific–Norfolk Southern Merger

Dear Chairman Fuchs,

Thank you for the opportunity to submit comments and participate in the Surface Transportation Board's consideration of the proposed merger between Union Pacific Railroad (UP) and Norfolk Southern Railway (NS). The Southern Rail Commission (SRC) appreciates the opportunity to provide perspective on the potential implications of this transaction for passenger rail service and future rail infrastructure investments across the Southeast.

The Southern Rail Commission takes no official position in support of or opposition to the proposed merger. The three states represented by the Commission—Louisiana, Mississippi, and Alabama—have differing perspectives on the transaction. Accordingly, these comments are not intended to advocate for or against the merger itself. Rather, they reflect the Commission's interest in ensuring that any outcome protects existing passenger rail service, supports future expansion, and provides meaningful commitments to the communities and partners that depend on the region's rail network.

The Southern Rail Commission

The Southern Rail Commission is an interstate rail compact representing Louisiana, Mississippi, and Alabama. Its origins date to 1982, when Congress approved Public Law 97-213, providing congressional consent to the initial Mississippi-Louisiana Rapid Rail Transit Compact. The compact was subsequently expanded to include Alabama, and the Louisiana-Mississippi-Alabama Rapid Rail Transit Commission was formed in August 1983. Today, the SRC is the nation's oldest interstate rail compact focused on advancing passenger rail connectivity and investment across a multi-state region.

For more than four decades, the Commission has worked with federal, state, and local partners, Amtrak, and the freight railroads to improve and maintain passenger rail service throughout its member states. This work includes supporting the three long-distance Amtrak routes serving the region: the Crescent, the Sunset Limited, and the City of New Orleans. The Commission has also played a central role in establishing passenger rail service along the Gulf

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Coast on three occasions, most recently through the successful launch of Amtrak Mardi Gras Service in August 2025.

Amtrak Mardi Gras Service operates twice daily between New Orleans, Louisiana, and Mobile, Alabama, with intermediate stops in Bay Saint Louis, Gulfport, Biloxi, and Pascagoula, Mississippi. The service reconnects communities along the Gulf Coast and provides passengers with access to the broader Amtrak network through connections in New Orleans. Its return followed years of coordination and investment to restore infrastructure damaged by Hurricane Katrina, demonstrating what can be accomplished when passenger rail advocates, public agencies, freight railroads, and communities work together toward a shared objective. Amtrak reports that the service carried 150,000 customer trips in its first year of operation (Amtrak news release, Aug. 18, 2026). For the record, Amtrak Mardi Gras Service is sponsored by the Louisiana and Mississippi Departments of Transportation and the City of Mobile, in cooperation with the Commission. (See Amended Application, Vol. 2 at 770, describing the service as "funded by the Southern Rail Commission.")

The Surface Transportation Board has played an important role in facilitating the coordination necessary to advance passenger rail service in the region, including bringing parties together to identify and secure the assets and infrastructure improvements needed to support restored service and improve on-time performance. The Commission's experience has reinforced that successful passenger rail expansion requires sustained cooperation among all parties, clear infrastructure commitments, and accountability for operational performance.

This history informs the Commission's interest in the proposed UP-NS merger. Union Pacific is a critical host railroad within the Commission's member states, and its continued engagement as a partner will be essential to the success of existing and future passenger rail initiatives. While the Commission remains committed to protecting and improving current passenger rail service, its long-term vision extends well beyond the Mardi Gras Service. Proposed expansions include passenger rail along the I-20 corridor, connecting Dallas–Fort Worth, Texas, and Meridian, Mississippi, as well as service between Baton Rouge and New Orleans and other opportunities throughout the region. This includes the proposed extension of Amtrak's Crescent from Meridian to Dallas–Fort Worth over the Meridian Speedway and Union Pacific's line west of Shreveport. The Commission has pursued this extension as a cooperative effort with Union Pacific. Union Pacific has indicated that it does not oppose use of its right-of-way for the extension, subject to the detailed analysis needed to identify the infrastructure required to host the service.

Union Pacific, Norfolk Southern, and Passenger Rail Expansion

Reliable passenger rail service is achievable when host railroads make the operational and infrastructure commitments necessary to support it. On-time performance (OTP) is not simply a function of existing conditions; it is also a matter of investment, coordination, and operational choices. UP and NS have the ability to provide the level of service expected under federal passenger rail requirements, and the Commission urges the Board to ensure that the proposed merger does not diminish that responsibility.

UP and NS should work cooperatively with Amtrak, the SRC, and other regional partners to fully evaluate and advance proposed passenger rail expansions. Infrastructure capacity constraints should be addressed through investment in the physical rail network rather than treated as a basis for prematurely determining that future passenger service is infeasible. In particular, should the Board approve the transaction, the applicants should commit to the

capacity improvements needed to support passenger rail growth along the I-20 corridor between Dallas–Fort Worth and Meridian, including increased capacity between Shreveport, Louisiana, and Dallas–Fort Worth, Texas, and targeted improvements at critical locations in Meridian and Jackson, Mississippi.

Conclusion

The Southern Rail Commission recognizes that the Surface Transportation Board must evaluate the proposed merger in accordance with the public interest and the applicable statutory standards. The Commission takes no position on whether the merger should be approved. However, should the Board determine that the transaction is consistent with the public interest, the Commission strongly urges that the passenger rail commitments outlined in these comments be incorporated into the Board's approval conditions and merger oversight framework.

The future of passenger rail in the Southeast depends on the willingness of host railroads to work with Amtrak, state agencies, interstate compacts, and local communities to maintain existing service and accommodate future growth. UP and NS will remain essential partners in that work. The Commission therefore asks the Board to establish clear, enforceable commitments and meaningful oversight to ensure that the proposed merger strengthens, not limits, the region's passenger rail network and its ability to serve communities across Louisiana, Mississippi, and Alabama.

Thank you for your consideration of the Commission's comments.

Respectfully submitted,



/s/ Knox Ross
Chairman
Southern Rail Commission

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of November, 2026, I served a copy of the foregoing Comments and Request for Conditions of the Southern Rail Commission on all Parties of Record in Docket No. FD 36873. Service was made by electronic mail to all Parties of Record for whom an email address is listed on the official service list maintained by the Surface Transportation Board. Parties of Record for whom no email address is listed were served by First-Class Mail, postage prepaid.

cc: Parties of Record