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

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

November 18, 2026

VIA E-FILING

Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: Finance Docket No. FD 36873, *Union Pacific Corporation and Union Pacific Railroad Company—Control—Norfolk Southern Corporation and Norfolk Southern Railway Company*: Public Comments Submitted by Public Rail Now

Public Rail Now (PRN), a party of record in this proceeding, submits the attached 135 public comments on the proposed transaction and asks that they be placed in the record. Public Rail Now (PRN) is a nonprofit organization advocating for a democratic, equitable freight rail system that serves the public good. PRN seeks to educate the public, mobilize support, and drive systemic change in the rail industry.

How the comments were collected. From September 1 to November 18, 2026, PRN operated an online comment form open to anyone impacted by this merger. Commenters wrote their own statements. PRN supplied no templates for comments. The form received 135 submissions: 119 distinct comments remain, and all are attached in full. By role, commenters identified as: railroad workers (60), general public (29), rail passengers (24), trackside community members (9), farm or agricultural (1), Shipper or small business (1), others (10) and unknown (1). Submissions also indicated the issues their opposition to this merger related to: labor and employment; local and community impacts; environmental impacts; rates and competitive access; service reliability; passenger rail; downstream mergers.

Names withheld. The comment form asked each commenter whether PRN could include their name in the filing. 44 chose to withhold it. PRN withheld the names, address, zip code and phone number of all commenters who chose to withhold their name. For these commenters, PRN removed contact information and listed only role and state. PRN made no other edits.

The majority of these comments came from railroad workers. PRN considered submitting names under seal, as the protective order allows, and decided against it. A sealed filing may be available to outside counsel for other parties, and PRN could not assure workers that their identities would stay protected. Several potential commenters said they were concerned about participating openly. In Decision No. 45, the Board stated that it "will not tolerate actual or threatened retaliation against a stakeholder for participating in this or any other proceeding before the Board," and that "any evidence of retaliation in this proceeding will be considered by the Board." *Union Pac. Corp.—Control—Norfolk S. Corp.* (Decision No. 45), FD 36873, slip

op. at 3 (STB served Nov. 4, 2026). PRN is uncertain whether federal law would protect employees from retaliation for commenting on merger policy, and has therefore withheld workers' names and identifying details so that workers and others could participate without that concern.

Scope. These comments reflect the experiences and views of the people who wrote them. PRN has not independently verified them. This submission is separate from any comments, evidence, or requests for conditions PRN files in its own name. PRN is not submitting evidence of retaliation here. Any such comments will be submitted separately as the Board has described.

PRN asks that the Board accept these comments and consider them in its public-interest review.

Respectfully submitted,

Tabitha Tripp

Public Rail Now

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314-884-8233

Attachment: Public Comments Submitted Through the PRN Comment Form (135 comments) "PRN Public Comment Jot Form Submissions FD 36873"

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of November 18, 2026, that I have this day served copies of this document upon all parties of record in this proceeding, by method of service consistent with 49 C.F.R. § 1104.12(a) in Docket No. FD 36873.



Tabitha Tripp
11/18/26

CC: Parties of Record