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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

Celanese Corporation
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Celanese is a 100-year-old, U.S.-based global leader in chemistry, producing chemical and specialty material solutions used across most major industries and consumer applications. Our businesses use our chemistry, technology and commercial expertise to create value for our customers, employees and shareholders. Headquartered in Irving, Texas, Celanese has operations in 27 countries that serve customers globally. Our products are vital to various industries including agriculture, automotive & transportation, medical & pharmaceuticals, and electrical & electronics, just to name a few. The products Celanese makes possible include adhesives, vehicle parts, medical devices, appliances, food ingredients, and building materials.

To source raw materials and move our products to customers, Celanese relies on various modes of transportation including trucking, ocean containers, waterways, pipelines, and rail. Across the U.S., Celanese has facilities in twelve states with seven rail-served facilities, and all but one are "captive" to only one Class 1 railroad. Additionally, we utilize rail at a terminal site that is adjacent to the Houston Ship Channel and is our major U.S. terminal hub.

Further consolidation among Class I railroads could increase the risk that captive shippers face higher costs, reduced service flexibility, diminished negotiating leverage, and greater exposure to supply chain disruptions, even where nominal routing alternatives continue to exist elsewhere in the network. Captive shippers have increased risk of impact to production rates due to any service issues. Moreover, even at site(s) with access to more than one Class I railroad, the commercial realities associated with this relationship could place significant pressure on shippers such as Celanese. This dynamic can limit a shipper's ability to exercise competitive choices even where alternative service options are technically available.

Additionally, industry investment decisions are based on numerous factors including having reliable and cost-competitive logistics options to optimally operate a supply chain network and deliver products to customers domestically and globally. Celanese is proud of our legacy of supplying chemical and specialty materials for critical domestic applications Americans use every single day. With consolidation in the rail sector in recent years, logistics optionality is nearly non-existent at our sites. Having competitive transportation options is an important factor for further investment in the U.S. For manufacturers that compete in global markets, efficient and competitively priced transportation networks are critical to maintaining the competitiveness of

U.S.-produced goods abroad. Celanese is a net exporter, and our ability to efficiently move products to domestic customers and international markets directly supports American manufacturing output, jobs and export growth. Policies that preserve and enhance competition within the freight rail network help strengthen the global competitiveness of U.S. manufacturers, support increased exports and contribute to reducing the nation's trade deficit by improving the cost competitiveness of goods produced domestically. At a time when our industry faces many global challenges, maintaining and increasing competitive rail options will help American manufacturers stay competitive at home and abroad. It is also directly tied to American affordability.

Shippers like Celanese have faced higher transportation costs, service disruptions and delays that increase the cost of manufacturing in the United States and create inefficiencies throughout the supply chain. Those impacts are not absorbed solely by manufacturers; they ultimately flow through to downstream customers and consumers in the form of higher prices and reduced product availability. The stakes are particularly significant for the chemical industry, since 96% of all manufactured goods rely on chemistry in some form. The products enabled by the chemistry industry are foundational to sectors including automotive, aerospace, energy, healthcare, electronics, agriculture, construction, and consumer products. As a result, higher transportation costs and reduced service reliability do not affect a single company or industry alone. They ripple throughout the broader economy by increasing costs for U.S. manufacturers, weakening global competitiveness, constraining export opportunities, and ultimately making it more difficult for American industry to compete with foreign producers. Maintaining competitive freight rail service is therefore critical not only for chemical manufacturers such as Celanese, but also for the broader manufacturing base that depends on efficient and reliable movement of raw materials and finished products.

We are proud members of the American Chemistry Council and share many of the concerns raised regarding what a merger of this magnitude could mean for shippers. Any transaction approved by the Surface Transportation Board should demonstrably increase rail-to-rail competition and serve the public interest. As the Board evaluates this proposal, we encourage consideration of safeguards that preserve competitive rates, maintain meaningful routing alternatives and expand reciprocal switching opportunities where appropriate. For manufacturers such as Celanese, competitive and reliable rail service is essential to maintaining a safe and resilient supply chain, supporting U.S. manufacturing investment, strengthening export competitiveness, and delivering value to our customers. We appreciate the opportunity to share our perspective as we evaluate what this decision could mean for us and our customers.

Landon Schale

Vice President, Logistics

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of November, 2026, I caused copies of the foregoing to be served by email or by first-class mail, postage prepaid, upon all parties of record in this proceeding and upon the other individuals that the Board has identified for service.

/s/ Landon Schale