November 18, 2026

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Member Richard J. Kloster
Surface Transportation Board
395 E Street SW
Washington, DC 20423

313189

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Office of Chief Counsel
November 18, 2026
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Public Record

Re: Control: Union Pacific Corp. and Union Pacific Railroad Co., Norfolk Southern Corp. and Norfolk Southern Railway Co.[1]

Dear Surface Transportation Board,

The American Composites Manufacturers Association (ACMA) appreciates the opportunity to comment on the revised application filed by Union Pacific Corporation and Union Pacific Railroad Company and Norfolk Southern Corporation and Norfolk Southern Railway Company (collectively, "Applicants"). ACMA joins other stakeholders in urging the Surface Transportation Board (STB) to deny the revised application because the Applicants have not demonstrated that the proposed merger would enhance rail-to-rail competition or otherwise serve the public interest.

ACMA is the unified voice of the composites industry, representing the full North American supply chain for fiber-reinforced polymer (FRP) composites, including manufacturers, distributors, suppliers, and service providers. ACMA members produce advanced composite materials and products used in infrastructure, transportation, energy, utilities, building and construction, defense, water systems, telecommunications, and other critical markets. Many ACMA members depend on reliable and affordable freight transportation to obtain raw materials and move

[1] *Federal Register, August 20, 2026, Docket No. 36873*

finished products to customers.[2] Additionally, many consumers use FRP composites in their everyday life and rely on low-cost freight to get them their goods.[3]

The proposed merger would combine two major Class I rail systems under common control and further concentrate the national rail market. Further consolidation of railways could reduce competitive options, increase costs, and degrade service. Robust competition requires meaningful choices among carriers. The STB should apply its merger standard by requiring expanded access to competitive freight rail service and determine whether the merger would create demonstrable and durable improvements in rail-to-rail competition for shippers, rather than relying on claims that single-line service would make rail more competitive with trucking or other modes.

Composite fabricators and manufacturers purchase resins, fibers, chemicals, equipment, and other inputs from geographical dispersed suppliers. Composite distributors work hard to get the right inputs at a competitive price to their customers. Higher freight costs increase the domestic production and can undermine competitiveness of American-made products. Additionally, consumers from around the country rely on affordable products, and competitive freight rail markets help keep production and transportation costs down, which in turn keeps those products affordable. The STB should evaluate whether manufacturers and other shippers would retain sufficient competitive leverage to obtain reasonable shipping rates and reliable service following the merger.

ACMA therefore urges the STB to deny the Revised Application. The STB should rigorously evaluate that the merger will expand meaningful rail-to-rail competition, maintain reasonable service, preserve competitive markets, and does not cause unnecessary transportation cost increases. Competition fuels American manufacturing. National freight rail policy should create more competitive options for American businesses, not fewer.

Please do not hesitate to contact Brad Lavelle, Senior Manager of Regulatory Affairs, at blavelle@acmanet.org with any questions. Thank you for considering ACMA's comments.

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[2] For more information about FRP composites go to: Composite Materials: Benefits, Uses & Applications - Discover Composites. Examples of composites in building and construction can be found here. ACMA members producing these products can be searched on ACMA's website.

[3] Some everyday items made with FRP composites are: Cars and trucks, bathtubs and showers, sports equipment like bicycles and pickleball paddles, and ladders.

Respectfully submitted,



Cindy L. Squires, Esq.
President & Chief Executive Officer
American Composites Manufacturers Association

CC: Parties of Record