

November 24<sup>th</sup>, 2025

The Honorable Patrick Fuchs  
Chairman  
Surface Transportation Board

The Honorable Michelle Schultz  
Vice Chairman  
Surface Transportation Board

The Honorable Karen Hedlund  
Member  
Surface Transportation Board

395 E Street, NW  
Washington, DC 20423

Dear Chairman Fuchs, Vice Chairman Schultz and Member Hedlund,

On behalf of the undersigned trade associations, chambers and businesses representing vital sectors of the U.S. economy, we write to express strong concerns regarding the proposed merger between Union Pacific Railroad and Norfolk Southern Railway.

Our industries collectively represent millions of American workers that depend on freight rail as an important link in the supply chain. Without it, American consumers can't affordably access the goods and services they rely on every day. Reliable and affordable freight rail service is essential to maintaining U.S. manufacturing strength, supporting energy security, and ensuring reliable supply chains.

History has shown that increased rail consolidation leads to fewer choices, higher transportation costs, service disruptions, and reduced economic competitiveness. Today, just four Class I railroads control more than 90% of freight rail traffic. The proposed UP/NS transaction would be the largest rail merger in history and would put control of more than 40% of rail traffic in the hands of a single railroad. It would further weaken the small amount of competition that currently exists in the railroad industry. Past rail mergers have triggered major breakdowns in the supply chain and increased costs for businesses and consumers alike.

Given the potential for widespread economic harm, it is essential that the Surface Transportation Board proceed with great care. The creation of a transcontinental railroad must not come at the expense of competition, service reliability, or the broader health of the U.S. supply chain.

We respectfully urge the Board to thoroughly scrutinize this merger proposal to ensure it does not undermine the integrity of our nation's transportation network or disrupt the supply chain.

Sincerely,

Agribusiness Association of Iowa  
Agribusiness Council of Indiana  
Agricultural Retailers Association  
Alabama Chemistry Council  
Alliance for Automotive Innovation  
Alliance for Chemical Distribution  
American Chemistry Council  
American Coatings Association  
American Foundry Society  
American Fuel & Petrochemical Manufacturers  
AmericanHort  
Associated Industries of Vermont  
Builders Association of Minnesota  
Can Manufacturers Institute  
Chemical Industry Council of Illinois  
Chemistry Council of New Jersey  
Chlorine Institute  
Communications Cable and Connectivity Association  
Council of Producers & Distributors of Agrotechnology  
Duluth Area Chamber of Commerce  
EPS Industry Alliance  
Essential Minerals Association  
Freight Rail Customer Alliance  
Georgia Chemistry Council  
Household and Commercial Products Association  
Illinois Farm Bureau  
Independent Lubricant Manufacturers Association  
Institute of Makers of Explosives  
Kentucky Association of Manufacturers  
Maine Forest Products Council  
Maine State Chamber of Commerce  
Manufacturers Association of Maine  
Massachusetts Chemistry & Technology Alliance  
Minnesota AgriGrowth Council

Minnesota Automobile Dealers Association  
Minnesota Crop Production Retailers  
Minnesota Farmers Union  
Minnesota Forest Industries  
Minnesota Grocers Association  
Montana Agricultural Business  
Montana Chamber of Commerce  
National Industrial Transportation League  
New York State Chemistry Council  
Nonwoven Fabrics Industry  
North Carolina Agribusiness Council  
North Dakota Association of Builders  
North Dakota Chamber of Commerce  
North Dakota Petroleum Council  
Ohio Chemistry Technology Council  
Pennsylvania Chemical Industry Council  
Performance Racing Industry  
Pet Food Institute  
Pine Chemicals Association International  
PLASTICS Industry Association  
Rail Passengers Association  
South Dakota Chamber of Commerce & Industry  
Specialty Equipment Market Association  
Spray Polyurethane Foam Alliance  
Treasure State Resources Association of Montana  
Vinyl Institute  
Wayzata West Metro Chamber  
West Virginia Manufacturers Association  
Willmar Lakes Area Chamber of Commerce  
Wisconsin Agri-Business Association