ASSOCIATED INDUSTRIES OF FLORIDA
The Voice of Florida Business Since 1920

October 26, 2026

312737

ENTERED
Office of Chief Counsel
October 26, 2026
Part of
Public Record

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

Subject: FD 36873 - AIF Opposition to the Merger of Union Pacific and Norfolk Southern.

Dear Chairman Fuchs:

On behalf of Associated Industries of Florida (AIF), I am writing to express our opposition to the proposed merger of Union Pacific and Norfolk Southern. On November 14, 2025, AIF submitted a comment letter encouraging the Surface Transportation Board to conduct a thorough examination of the proposed merger.

Before the official application was submitted, we hoped the merger would create economies of scale by reducing transit times and increasing reliability. Our review of the applicants' initial and subsequent filings raises substantial concerns regarding the transaction's potential effects on Florida's freight transportation network, including rail-served industries across our state that depend on safe, reliable, and competitive rail service. We are also concerned about the potential employment impacts on railroad employees in Florida associated with the proposed consolidation and the resulting consequences for rail-dependent communities across the state.

Florida, with its 15 major seaports, robust business climate, and rapidly growing population, relies heavily on reliable rail transportation. In addition, our acute emergency needs following natural disasters, such as hurricanes, set Florida apart from many states in its dependence on rail. Based on the record currently before the Board, it appears that the proposed transaction could introduce service disruptions, reduce competitive transportation options for shippers, and create broader imbalances within the regional freight marketplace.

For these reasons, AIF opposes the proposed merger of Union Pacific and Norfolk Southern.

Sincerely,

Brewster Bevis

President & CEO

CC: Parties of Record