ST LOUIS REGIONAL FREIGHTWAY
Your Gateway to the World

October 21, 2026

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October 21, 2026
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Public Record

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423-0001

RE: Proposed Merger of Union Pacific and Norfolk Southern

Dear Chief of Case Administration:

On behalf of the St. Louis Regional Freightway (the Freightway), a Bi-State Development enterprise, I respectfully submit the attached letter dated September 23, 2026, addressed to the members of the Surface Transportation Board.

Thank you for the opportunity to provide comments regarding the proposed acquisition of Norfolk Southern Corporation and Norfolk Southern Railway Company by Union Pacific Corporation and Union Pacific Railroad Company. We appreciate the Board's consideration of the Freightway's perspective on this important matter.

Sincerely,

Mary C. Lamie
Executive Vice President of Multi Modal Enterprises
Bi-State Development

cc: Parties of Record

One Metropolitan Square
211 North Broadway, Suite 700
St. Louis, MO 63102-2759
TheFreightway.com

ST LOUIS REGIONAL FREIGHTWAY
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September 23, 2026

Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: Proposed Merger of Union Pacific and Norfolk Southern

Dear Chairman and Members of the Surface Transportation Board:

On behalf of the St. Louis Regional Freightway, a business enterprise of Bi-State Development and the public and private sector partners we represent throughout Eastern Missouri and Southwestern Illinois, I appreciate the opportunity to provide comments regarding the proposed acquisition of Norfolk Southern Corporation and Norfolk Southern Railway company by the Union Pacific Corporation and the Union Pacific Railroad Company.

The St. Louis region is one of the nation's largest rail hubs and serves as a vital rail interchange gateway within the national freight network for manufacturers, distributors, and logistics providers across the country. It is served by all six Class I railroads, providing access to the North American rail network and helping connect businesses to national and global markets. The Terminal Railroad Association of St. Louis (TRRA) provides an efficient, safe and economical method of interchanging rail traffic among all the Class I railroads within the St. Louis region's rail hub, serving as a key connection between east-west and north-south freight movements.

The strength of the St. Louis region as a freight and logistics center is rooted in its connectivity. Rail, river, roadway, and aviation assets work together to support efficient freight movement and supply chain reliability. Those advantages have helped to position the region as a nationally significant freight hub and continue to attract manufacturing, logistics and industrial investment. These advantages have helped position the region as the "Agricultural Coast of America" and support the nation's most efficient inland port system. The St. Louis Metro Ports collectively move nearly four times the average tons per mile compared to the other eight inland port districts in the United States, underscoring the region's critical role in supporting commerce and agricultural exports. Connectivity to a robust and efficient rail system is a primary key to why the barge system functions as efficiently as it does.

Our region is also making substantial investments to strengthen freight mobility and expand future capacity. Through the St. Louis Regional Freightway's Priority Projects initiative and the collaborative efforts of public and private stakeholders, work is underway to improve rail infrastructure, advance rail-served industrial development opportunities and strengthen multimodal freight connections that benefit both the St. Louis region and the national supply chain.

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Notable completed projects include the rehabilitation of the Merchants Bridge in fall 2022, more than doubling capacity on this vital Mississippi River crossing linking Missouri and Illinois at downtown St. Louis. Another fully funded project on this year's list includes the $75 million rehabilitation of the MacArthur Bridge, a second nearby rail crossing over the Mississippi River. Work is also advancing in the St. Louis region on the Multimodal Freight Yard Expansion at the Madison Yard, where TRRA is focused on expanding railcar capacity by approximately 1,500 cars.

As the Board evaluates this proposed transaction, we respectfully request that any changes to rail operations, routing, service patterns or network structure carefully consider the existing movement of freight through the St. Louis region, the gateway and interchange functions it performs, and the significant investments currently underway to enhance rail capacity and service. Preserving efficient freight flows through St. Louis is important not only to our region, but also to the manufacturers, shippers and supply chains that rely on this critical connection point within the national rail network. We encourage the Board to ensure that any approved transaction strengthens, rather than diminishes, the efficiency and reliability of freight movements through major rail gateways such as St. Louis.

Thank you for your consideration of these comments and for your careful review of the potential impacts of this proposed merger.

Sincerely,

Mary C Lamie

Mary C. Lamie
Executive Vice President of Multi Modal Enterprises
Bi-State Development