

Peter W. Denton
202 429 6445
pdenton@steptoe.com

Steptoe

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.steptoec.com

309337

March 12, 2025

ENTERED
Office of Proceedings
March 12, 2025
Part of
Public Record

CSXT-3

VIA E-FILING

Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: **STB Docket No. FD 36836, Norfolk Southern Corporation & Norfolk
Southern Railway Company—Acquisition of Control—Norfolk &
Portsmouth Belt Line Railroad Company**

Dear Ms. Brown:

Enclosed please find a letter from CMA CGM in regard to the minor
application filed by Norfolk Southern Corporation and Norfolk Southern Railway
Company in the above-referenced proceeding.

Respectfully submitted,

/s/ Peter W. Denton

Peter W. Denton
Attorney for CSX Transportation, Inc.

cc: All parties of record



March 12, 2025

VIA E-FILING

Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: STB Docket No. FD 36836, Norfolk Southern Corporation & Norfolk Southern Railway Company—Acquisition of Control—Norfolk & Portsmouth Belt Line Railroad Company

Dear Ms. Brown:

CMA CGM submits this letter in regard to the minor application filed by Norfolk Southern Corporation and Norfolk Southern Railway Company (collectively, “NSR”) on February 14, 2025 in the above-referenced proceeding.

CMA CGM has an interest in this proceeding. Led by Rodolphe Saadé, the CMA CGM Group, a global leader in shipping and logistics, serves more than 420 ports around the world on five continents. The CMA CGM Group is a top carrier in the United States across our portfolio of maritime, inland and logistics offerings, providing our customers with the best end-to-end services in the country.

CMA CGM is concerned by NSR’s assertion that the proposed transaction clearly will not have any anticompetitive effects. It is important to CMA CGM that there is rail competition at the terminals that we serve. CMA CGM is concerned that NSR’s application may have the effect of preventing CSX Transportation, Inc. from becoming an effective rail competitor at Norfolk International Terminals. Therefore, CMA CGM urges the Surface Transportation Board to carefully consider the competitive issues presented by NSR’s application.

Sincerely,

Djordje Tubic
Vice President, Procurement

CERTIFICATE OF SERVICE

I hereby certify that I have caused this Letter in Docket No. FD 36836 to be served electronically or by first class mail, postage pre-paid, on all parties of record in this proceeding.

/s/ Sally Mordi

Sally Mordi
Attorney for CSX Transportation, Inc.

March 12, 2025