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By E-Filing

September 30, 2025
310151

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

ENTERED
Office of Chief Counsel
September 30, 2025
Part of

**Re: Docket No. FD 36500 (Sub-No. 6), Canadian Pacific Public Record
Railway Limited, et al.—Control—Kansas City Southern,
et al. (General Oversight)**

Dear Chief of Case Administration:

This letter is being submitted on behalf of Union Pacific Railroad Company to address an issue involving representations Applicants made regarding service over the Meridian Speedway in seeking Board approval of the transaction that created Canadian Pacific Kansas City Limited (CPKC).

In the merger proceeding, in response to concerns about the Meridian Speedway's future expressed by Norfolk Southern Railway Company, CPKC told the Board, "Neither NS nor the Board had any reason to be concerned that CPKC will be a good steward of service," and that CPKC would take steps to "increase train frequency and improve service" over the Meridian Speedway. (CP/KCS Response to Comments, Reply Volume I, pp. 264, 267.)

As described in the attached Verified Statement of Joseph N. Davis, Union Pacific's Director – Network Surveillance, CPKC is not living up to its commitments. Before the merger, Union Pacific delivered intermodal trains of up to 11,000 feet in length to Kansas City Southern Railway at Shreveport, Louisiana, for movement to Norfolk Southern at Meridian, Mississippi, via the Meridian Speedway. Shortly after the Board approved the merger, CPKC imposed a 8,500-foot length limit on trains it would accept at Shreveport for movement over the Meridian Speedway. Union Pacific agreed to abide by the length restriction with the understanding that CPKC would provide the additional resources to move the larger number of trains required as a result of the length restriction. However, CPKC has failed to provide the additional resources. As a result, Union Pacific and its customers are experiencing unacceptable delays, and the delays are increasing.

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The Board should investigate the deterioration in CPKC's service over the Meridian Speedway and hold CPKC to the commitments it made.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael L. Rosenthal".

Michael L. Rosenthal
*Attorney for Union Pacific
Railroad Company*

Attachment

cc: All Parties of Record
Chairman Patrick J. Fuchs
Hon. Michelle A. Schultz
Hon. Karen J. Hedlund

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

DOCKET NO. FD 36500 (SUB-NO. 6)

**CANADIAN PACIFIC RAILWAY LIMITED, ET AL.
– CONTROL –
KANSAS CITY SOUTHERN, ET AL.
(GENERAL OVERSIGHT)**

**VERIFIED STATEMENT OF
JOSEPH N. DAVIS**

My name is Joseph N. Davis. I am Director – Network Surveillance, Network Planning & Operations, Operations Department, for Union Pacific Railroad Company. I joined Union Pacific in 2014 and have held my current position since June 2022. I am responsible for our operating partners in the field adhering to the transportation plan. Specifically, my team reviews transportation plan exceptions and either approves or declines exception requests. In addition, my team tracks problematic train performance over the entire network.

I. Issue with Union Pacific Z-Train Traffic Delivered to CPKC for Movement Eastbound on the Meridian Speedway.

Union Pacific has historically delivered eastbound premium intermodal trains, which we call Z-trains, of up to 11,000 feet in length to Kansas City Southern Railway (KCSR) at Shreveport, Louisiana for movement to Norfolk Southern Railway (NS) at Meridian, Mississippi.

However, not long after the merger between KCSR and the Canadian Pacific Railway, the new CPKC stated it would reduce the maximum train length for these movements to 8,500 feet. I do not know the reason for this restriction.

CPKC set the new length restriction at 8,500 feet on August 25, 2025. Union Pacific began immediately cutting trains (including trains already en route) to match the new length restriction. Union Pacific took that action with the understanding CPKC would support its new restriction by moving the increased number of trains that would result from the restriction.

However, CPKC is not following through on moving all the cars to Meridian at the same level of service provided before the restriction. CPKC service from the Hollywood Yard at Shreveport (AEI reader 1441 (South of the Yard) and AEI reader 1442 (North of the Yard)) to Meridian had an average car dwell time of 3.9 hours from July 1, 2025, to August 24, 2025. Since the August 25th decision to restrict train lengths, CPKC dwell time increased to 8.4 hours in August and 10.6 hours in September. These measurements represent an overall car dwell of 10.1 hours since the length restriction was put in place. I am unaware of any significant volume increase on the network that could justify this significant increase in car dwell.

Given the historic volume of operations over the route from Shreveport to Meridian (also known as the “Meridian Speedway”), I am unaware of any reason why CPKC would impose a train length restriction when it is also unable to support the additional trains that would naturally result from that restriction.

VERIFICATION

I, Joseph N. Davis, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge. Further, I certify that I am qualified and authorized to file this statement.

Executed on this 30th day of September, 2025.

/s/ Joseph N. Davis