

November 17, 2025

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

The Honorable Michelle Schultz
Vice Chair
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423

The Honorable Karen Hedlund
Member
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423

Dear Chairman Fuchs, Vice Chair Schultz, and Member Hedlund:

As leaders committed to advancing economic opportunity, protecting free enterprise, and ensuring fair competition, we write to express our concerns about the proposed merger between Union Pacific (UP) and Norfolk Southern (NS). While we recognize the importance of private sector investment and efficiency, this merger raises serious questions about its long-term impact on competition, service reliability, and the cost of doing business in America.

If approved, the combined UP-NS system would control nearly 45 percent of all U.S. rail tonnage and hold dominant market share in critical commodity sectors including chemicals, metals, lumber, motor vehicles and equipment, crushed stone, sand and gravel, food and kindred products, and iron and steel scrap. These commodities directly affect the cost of consumer goods, housing, energy, and food—core expenses for American families and small businesses. Reduced competition in these areas will inevitably lead to higher prices and fewer choices. This merger could negatively affect America's ability to compete with China, and it has the potential to pose significant risks for the industrial and agricultural production that powers state economies and the broader American manufacturing base.

Many shippers would face limited or no viable rail alternatives at origin or destination, creating a new generation of captive customers. This loss of routing flexibility and competitive pressure would be especially harmful to smaller communities and businesses that depend on reliable rail access to stay competitive in national and global markets.

Past mergers have shown that integration challenges can lead to widespread service disruptions, with ripple effects across the entire rail network. The proposed UP-NS merger spans 50,000 route miles across 43 states, and the risks of operational breakdowns and supply chain instability are real and significant.

It is vital that the STB use its process to fully consider how this merger will affect all stakeholders, including workers, manufacturers, farmers, and consumers, so that increased monopolistic power does not stifle innovation and productivity in industry, put inflationary pressure on household budgets, or otherwise burden the economy as a whole with the costs of this merger. We urge the Board to carefully evaluate this merger and ensure that any approved transaction clearly enhances freight rail competition, protects service quality, strengthens supply chains, improves safety, and supports a resilient freight rail system that works for all Americans.

Sincerely,

/s/ Warren Petersen
Senate President Warren Petersen
Arizona

/s/ Greg Hertz
Senate Taxation Chair Greg Hertz
Montana

/s/ T.J. Shope
Senate President Pro Tempore T.J. Shope
Arizona

/s/ Brandon Ler
Speaker of the House Brandon Ler
Montana


Senate Majority Leader John Kavanagh
Arizona

/s/ Steve Fitzpatrick
House Majority Leader Steve Fitzpatrick
Montana

/s/ Les Eaves
Legislative Council House Co-Chair Les Eaves
Arkansas

/s/ Anthony Bucco
Senate Republican Leader Anthony Bucco
New Jersey


Senate Republican Leader Cleave Simpson
Colorado

/s/ John DiMaio
Assembly Republican Leader John DiMaio
New Jersey

/s/ Ty Winter
House Assistant Republican Leader Ty Winter
Colorado


Senator Crystal Brantley
New Mexico

/s/ Stephen Harding
Senate Republican Leader Stephen Harding
Connecticut



State Representative Michael Smith
Delaware



House Majority Caucus Chair Bruce Williamson
Georgia

/s/ Mark Harris
Senate Assistant Majority Leader Mark Harris
Idaho

/s/ Jim Woodward
Senate Vice-Chair Finance Jim Woodward
Idaho



Senate Republican Leader Trey Stewart
Maine

/s/ Patrick O'Connor
Senate Asst. Republican Leader Patrick O'Connor
Massachusetts

/s/ Mark Johnson
Senate Republican Leader Mark Johnson
Minnesota

/s/ Gail Armstrong
House Republican Leader Gail Armstrong
New Mexico

/s/ Rebecca Dow
House Republican Caucus Chair Rebecca Dow
New Mexico

/s/ David Hogue
Senate Majority Leader David Hogue
North Dakota



Senate Assistant Majority Leader Jerry Klein
North Dakota

/s/ David Clemens
Senate Transportation Chair David Clemens
North Dakota

/s/ Robin Weisz
Speaker of the House Robin Weisz
North Dakota

/s/ Mike Beltz
House Agriculture Chair Mike Beltz
North Dakota

/s/ Jessica de la Cruz
Senate Republican Leader
Rhode Island

/s/ John Jasinski
Senate Deputy Republican Leader John Jasinski
Minnesota



Senate Asst. Republican Leader Jordan Rasmusson
Minnesota

/s/ Chris Karr
Senate President Pro Tempore Chris Karr
South Dakota

/s/ Randy Deibert
Senate Transportation Chair Randy Deibert
South Dakota

/s/ Harry Niska
House Republican Floor Leader Harry Niska
Minnesota

/s/ Casey Crabtree
Senate Commerce & Energy Chair Casey Crabtree
South Dakota

/s/ Jon Koznick
House Transportation Co-Chair Jon Koznick
Minnesota



House Joint Appropriations Chair Mike Derby
South Dakota

/s/ Josh Harkins
Senate Finance Chair Josh Harkins
Mississippi



House DOGE Chair Giovanni Capriglione
Texas

/s/ Chuck Younger
Senate Transportation Chair Chuck Younger
Mississippi

/s/ Charlie Geren
House Administration Chair Charlie Geren
Texas

/s/ Bill Pigott
House Agriculture Chair Bill Pigott
Mississippi

/s/ Cody Harris
House Natural Resources Chair Cody Harris
Texas

/s/ Jody Stevenson
House Ways & Means Vice Chair Jody Stevenson
Mississippi

/s/ Ronald Winterton
Senate Gov't Operations Chair Ronald Winterton
Utah

/s/ Jason Bean
Senate Agriculture Chair Jason Bean
Missouri

A handwritten signature in black ink, appearing to read "Chad Perkins".

/s/ Chad Perkins
House Speaker Pro Tempore Chad Perkins
Missouri

/s/ Matt Regier
Senate President Matt Regier
Montana

/s/ Ken Bogner
Senate President Pro Tempore Ken Bogner
Montana

/s/ Tom McGillvray
Senate Majority Leader Tom McGillvray
Montana

/s/ Pattie McCoy
House Republican Leader Pattie McCoy
Vermont

/s/ Tara Nethercott
Senate Majority Floor Leader Tara Nethercott
Wyoming

/s/ Scott Heiner
House Majority Floor Leader Scott Heiner
Wyoming

/s/ John Braun
Senate Republican Leader John Braun
Washington

A handwritten signature in black ink, appearing to read "Drew Stokesbary".

House Republican Leader Drew Stokesbary
Washington