



January 20, 2026

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

Re: Docket No. FD 36873

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

As representatives serving, promoting and protecting agriculture, we ask you to carefully evaluate the impact of additional consolidation in the nation's freight railroad system. The proposed merger between the Union Pacific Railroad (UP) and Norfolk Southern (NS) raises important questions for America's agricultural industry, which is uniquely reliant on a reliable, competitive, and resilient rail network.

Railroads are critical throughout the agricultural supply chain – moving inputs like fertilizer and crop protection tools, grain and food products, and farm equipment. Our food supply depends on shipping commodities from where they're grown to destination mills and processing facilities, often utilizing more than one railroad. Because our farmers can grow more than we consume domestically, railroads are also fundamental to our ability to export agricultural commodities. For many agricultural shippers, rail is not simply one option among many, but an essential link to markets.

A combined UP-NS railroad would control over 40 percent of the U.S. freight moving by rail, and an unprecedented market share in many specific commodity sectors. This level of concentration warrants

careful consideration of how competition would be preserved and enhanced, particularly for captive and near-captive agricultural shippers.

Consistent concerns exist from agriculture shippers over unpredictable rail service. Missed or delayed rail car deliveries in the highly seasonal agricultural products industry reverberate from farms to Main Streets. Farm country is very familiar with limited leverage over Class I railroads. Over generations, farm families and agribusinesses have experienced rail consolidation, which resulted in fewer choices and increased shipper vulnerability where competitive alternatives are limited.

We are concerned that, absent strong safeguards, some current origin-destination options could become less accessible through changes in rates, service terms, or network rationalization, further limiting competitive options for agricultural shippers.

In comments provided by the United States Department of Agriculture during the STB's 2000 review of the new major rail merger regulations, it cautioned: "Efficiency benefits, in contrast to benefits which shippers derive from effective competition, are speculative."

In addition to our concerns over reduced competition, experience shows we also should be wary of how the new combined railroad would impact freight traffic on other operating railroads in the U.S., and elevators, ports, and manufacturing facilities served by multiple railroads. Past mergers demonstrate that integration challenges can have broader system effects, particularly during transition periods. Beyond that, the nature of the inter-connected national freight system will feel the effects of any issues, particularly with a company with such market dominance. The ripple effect on the entire supply chain is cause for concern.

The Surface Transportation Board (STB) must measure this merger as being in the public interest, including whether it adversely affects competition among rail carriers in the national rail system. For agriculture, maintaining and enhancing competition is critical. It is not a choice between trucks and rail service. Our large quantity bulk commodities moving hundreds of miles must move by rail, making competitive rail service essential for producers, processors, and exporters.

America has an efficient, highly productive agricultural industry, but we face constant global competition, increasing input costs and uncertain markets. We strongly encourage the STB to ensure that any merger approval clearly demonstrates tangible, enforceable benefits to competition and service for agriculture shippers and to support a competitive rail network that serves our industry well now and into the future.

Sincerely,



Mike Naig
Iowa Secretary of Agriculture



Thom Petersen
Commissioner, Minnesota Department of Agriculture



Andy Gipson
Mississippi Commissioner of Agriculture and
Commerce



Chris Chinn
Director, Missouri Department of Agriculture



Jillien Streit
Montana Director of Agriculture



Doug Goehring
North Dakota Commissioner of Agriculture



Brian Baldridge
Director, Ohio Department of Agriculture



Blayne Arthur
Oklahoma Secretary of Agriculture



Hunter Roberts
Secretary, South Dakota Department of
Agriculture and Natural Resources



Randy Romanski
Secretary, Wisconsin Department of
Agriculture, Trade and Consumer Protection