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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

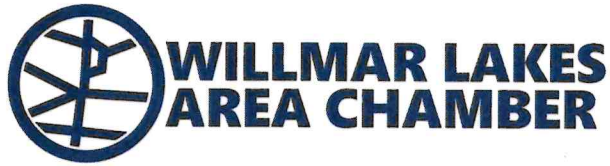
The Honorable Karen Hedlund
Member
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423

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

On behalf of the Willmar Lakes Area Chamber of Commerce, we write regarding the proposed merger between Union Pacific Railroad (UP) and Norfolk Southern Railway (NS). We respectfully request that the Surface Transportation Board ("STB," or "the Board") carefully evaluate this transaction under its post-2001 "Major Rail Consolidation Procedures," with particular attention to preserving and, where possible, enhancing competition for shippers in rural regions like ours.

The Willmar Lakes Area Chamber of Commerce is a regional business and community advocacy organization representing employers and employees across west-central Minnesota. Our members include agricultural producers, grain elevators, processors, manufacturers, distributors, and retailers who all rely directly or indirectly on dependable, competitively priced freight rail service. Rail is a backbone of our local economy and a critical link between rural communities like ours and domestic and global markets.

As proposed, a UP/NS merger would place a significant share of U.S. rail freight under a single system spanning tens of thousands of route-miles. For many shippers in our region, including agricultural producers, fertilizer suppliers, feed manufacturers, and other bulk commodity shippers, rail is not one option among many, it is often the only practical way to reach key markets at scale and at a competitive cost. In that context, even modest changes in competition, routing options, or service reliability can have outsized effects on local businesses and communities.



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We recognize that rail mergers can, in some cases, yield efficiencies and operational improvements. At the same time, we are mindful of the Board's experience with past large-scale consolidations and the reasons why the post-2001 merger rules explicitly require that applicants demonstrate public benefits and protections for competition, not merely the absence of harm. That standard is especially important in already concentrated markets such as freight rail.

From the perspective of the Willmar Lakes Area and the broader Upper Midwest, we would highlight three areas where we believe close attention and strong safeguards are needed:

1. **Agricultural supply chains and rural economies**
Farmers, ranchers, and processors in our region depend on flexible, reliable rail service to move grain, oilseeds, livestock feed, and processed products to domestic and export markets. Reduced competitive pressure or diminished service options could lead to higher transportation costs, less favorable terms, and slower resolution of local service issues. Those impacts ultimately flow through to farm incomes, local tax bases, and the prices paid by consumers for food and other essentials.
2. **Network resiliency and service quality**
Large-scale mergers can introduce significant operational complexity. We encourage the Board to consider carefully how this transaction would affect network resiliency—particularly during peak agricultural shipping seasons and to ensure that any approval includes clear service commitments, monitoring, and remedies that prevent prolonged disruptions.
3. **Long-term competitive dynamics**
Once shippers lose competitive options, it is difficult to restore them. We respectfully ask the Board to scrutinize how this merger would affect routing flexibility and competitive access for captive and rural shippers over the long term, and to condition any approval on concrete, enforceable measures that maintain meaningful competition and protect against unreasonable rates or service degradation.

In light of these considerations, we urge the Board to proceed with great care, to fully apply its post-2001 merger standards, and should the transaction move forward, to require strong, measurable protections that preserve competition and safeguard the interests of small and mid-sized communities and businesses. Our goal is not to oppose change for its



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own sake, but to ensure that any changes to the rail network support, rather than undermine, the economic vitality of regions like the Willmar Lakes Area.

We appreciate the Board's continued commitment to a balanced and competitive rail network and to the economic health of communities, workers, and shippers across the country. The Willmar Lakes Area Chamber of Commerce stands ready to provide additional local context, data, and perspectives from our member businesses as the Board considers this application.

If you have any questions or require additional information, please contact me at jmiller@willmarareachamber.com.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "James Miller", is written over a faint, circular blue line.

James Miller
President & CEO
Willmar Lakes Area Chamber of Commerce