



**APTA RT-S-OP-017-11, Rev. 2**

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Operating Practices Working Group

# Electronic Device Distraction Policy Requirements

**Abstract:** This standard provides electronic device distraction policy requirements for rail transit agencies to ensure that transit employees remain focused on their tasks without distraction.

**Keywords:** distraction, electronic device, mobile phone

**Summary:** Though the use of electronic devices can be helpful in many transit situations, their use must be controlled in order to keep transit employees focused on their duties while performing safety-critical tasks. This standard establishes requirements for a policy that provides direction as to when and where rail transit agency employees may and may not use electronic devices. Though descriptions of safe areas may vary from agency to agency, the intent of the meaning of “safe use location” remains consistent. This standard also requires that each rail transit agency must monitor compliance and address noncompliance in accordance with its electronic device distraction policy.



## Foreword

The American Public Transportation Association is a standards development organization in North America. The process of developing standards is managed by the APTA Standards Program's Standards Development Oversight Council (SDOC). These activities are carried out through several standards policy and planning committees that have been established to address specific transportation modes, safety and security requirements, interoperability, and other topics.

APTA used a consensus-based process to develop this document and its continued maintenance, which is detailed in the [manual for the APTA Standards Program](#). This document was drafted in accordance with the approval criteria and editorial policy as described. Any trade name used in this document is information given for the convenience of users and does not constitute an endorsement.

This document was prepared by the Operating Practices Working Group as directed by the Rail Standards Policy and Planning Committee.

This document represents a common viewpoint of those parties concerned with its provisions, namely transit operating/planning agencies, manufacturers, consultants, engineers and general interest groups. APTA standards are mandatory to the extent incorporated by an applicable statute or regulation. In some cases, federal and/or state regulations govern portions of a transit agency's operations. In cases where there is a conflict or contradiction between an applicable law or regulation and this document, consult with a legal adviser to determine which document takes precedence.

This document supersedes APTA RT-S-OP-017-11, Rev. 1, which has been revised. Below is a summary of changes from the previous document version:

- Some global changes to section headings and numbering resulted when sections dealing with references and acronyms were moved to the end of the document.
- Changed references from "rail transit system (RTS)" to "rail transit agency."
- Global edits for grammar, syntax, clarity and consistency throughout the document.
- Expanded Section 1, "General requirements"; Section 1.1, "Mainline operation"; and Section 1.3, "Roadway worker activity."
- Added Section 1.6, "Exceptions."
- Replaced Section 2.2, "RTS authorized mobile phones" with "Agency-issued mobile phones, tablets or other electronic devices."
- Added Section 2.3, "Exceptions."
- Added Section 4, "Training and familiarization."
- Added Section 5, "Medical exceptions."
- Added Section 6, "Hazard analysis for new uses of electronic device technology."
- Added Section 7, "New technologies."



## Table of Contents

Foreword .....	ii
Participants.....	iv
Introduction.....	v
Scope and purpose .....	v
Note on alternate practices.....	v
<b>1. General requirements .....</b>	<b>1</b>
1.1 Mainline operation .....	2
1.2 Employees who direct revenue and nonrevenue rail vehicle movement .....	2
1.3 Roadway worker activity .....	2
1.4 Stations, yards and maintenance facilities .....	3
1.5 Other vehicles .....	3
1.6 Exceptions.....	3
<b>2. Authorized electronic devices .....</b>	<b>3</b>
2.1 Agency-issued two-way radios .....	3
2.2 Agency-issued mobile phones, tablets or other electronic devices.....	4
2.3 Exceptions.....	4
<b>3. Rule compliance program .....</b>	<b>4</b>
<b>4. Training and familiarization .....</b>	<b>4</b>
<b>5. Medical exceptions .....</b>	<b>4</b>
<b>6. Hazard analysis for new uses of electronic device technology.....</b>	<b>4</b>
<b>7. New technologies.....</b>	<b>4</b>
Related APTA standards.....	5
References.....	5
Definitions .....	5
Abbreviations and acronyms.....	6
Document history.....	6



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## **Introduction**

*This introduction is not part of APTA RT-S-OP-017-11, “Electronic Device Distraction Policy Requirements.”*

With advancements in technology come the possibility that the operator of revenue or nonrevenue vehicles or an employee working around the track way will use a device in a way that will compromise their own safety and the safety of others. Indeed, there have been accidents that have caused serious injury and death directly related to the operator of a revenue or nonrevenue vehicle being distracted while using an electronic device such as a mobile phone. Though the use of electronic devices can be helpful in many transit situations, the use of them while working in or around revenue or nonrevenue vehicles must be regulated in order to keep transit employees focused on their duties while performing safety-critical tasks.

APTA recommends the use of this document by:

- individuals or organizations that operate rail transit systems;
- individuals or organizations that contract with others for the operation of rail transit systems; and
- individuals or organizations that influence how rail transit systems are operated (including but not limited to consultants, designers and contractors).

## **Scope and purpose**

The intent of this standard is to control the use of electronic devices as a means of eliminating unsafe distractions that have the potential to harm employees, passengers and the general public, as well as the potential to damage rail transit agency equipment and/or infrastructure. This standard applies to rail transit agencies that operate rail fixed guideway systems, including shared-use systems. This standard requires that each rail transit agency establish an electronic device distraction policy and monitor and enforce compliance with that policy. The policy must include prohibited and acceptable use of electronic devices in the performance of safety-critical work, including but not limited to operation of rail vehicles and authority over rail vehicle movement. It must also include provisions for those working in the rail transit agency maintenance and storage facilities and stations, and when fouling the right-of-way.

## **Note on alternate practices**

Individual rail transit systems may modify the practices in this standard to accommodate their specific equipment and mode of operation. APTA recognizes that some rail transit systems may have unique operating



environments that make strict compliance with every provision of this standard impossible. As a result, certain rail transit systems may need to implement the standards and practices herein in ways that are more or less restrictive than this document prescribes. A rail transit system may develop alternates to APTA standards so long as the alternates are based on a safe operating history and are described and documented in the system's safety program plan (or another document that is referenced in the system safety program plan).

Documentation of alternate practices shall:

- identify the specific APTA rail transit safety standard requirements that cannot be met;
- state why each of these requirements cannot be met;
- describe the alternate methods used; and
- describe and substantiate how the alternate methods do not compromise safety and provide a level of safety equivalent to the practices in the APTA safety standard (operating histories or hazard analysis findings may be used to substantiate this claim).

# Electronic Device Distraction Policy Requirements

## 1. General requirements

It is essential that rail transit agency employees be prepared for and perform their assignments in accordance with agency policy. The rail transit agency may address some provisions of this standard outside of a policy and instead in a rule or procedure.

The rail transit agency shall not allow use of any personal electronic device, including hands-free headsets, under any circumstance while operating the train or directing train movement. The rail transit agency shall consider expanding the provisions of this standard to all safety-sensitive employees, as defined by the rail transit agency.

This policy must clearly identify what electronic devices are permitted for use, when and where their use is permitted and prohibited, and where and how electronic devices must be kept or stowed when their use or possession is not permitted.

The rail transit agency shall communicate this policy to affected employees and receive acknowledgment in accordance with rail transit agency requirements.

The rail transit agency shall ensure that its policies align with state, local or other laws and explain if rail transit agency policy requirements exceed those established under regulatory authority. If the rail transit agency has established any exceptions to its policy, these shall be clearly delineated in the policy.

The rail transit agency shall develop an electronic device distraction policy that prohibits employees from the unauthorized use of electronic devices while operating revenue and/or nonrevenue rail vehicles. Each rail transit agency shall develop policies for employees that prohibit the unauthorized use of electronic devices while performing safety-critical tasks and when in certain locations.

While each rail transit agency shall define safety-sensitive tasks, the following shall be included as a minimum:

- When operating revenue and nonrevenue rail vehicles.
- While responsible for the direct control over revenue and nonrevenue rail vehicle movement.
- When performing any other safety-sensitive tasks, as defined by the rail transit agency.
- While fouling the right-of-way, in maintenance and storage facilities, and at any other location where the use of electronic devices will unnecessarily expose the user or others to a potentially hazardous condition.

The rail transit agency shall clearly define or delineate whether it allows any electronic device use while on duty and under what circumstances or in what locations such permission is granted. The rail transit agency shall ensure that such exceptions do not compromise safety.

**APTA RT-S-OP-017-11, Rev. 2**  
**Electronic Device Distraction Policy Requirements**

The rail transit agency shall establish requirements for placement or storage of the electronic device while employees are on duty and/or engaged in action during which time the electronic device use is prohibited.

The rail transit agency shall determine other issues related to electronic device distraction to be identified within its electronic device distraction policy.

## **1.1 Mainline operation**

For the purposes of this standard, the mainline is defined as the operating track, including but not limited to track serving all stations and tail tracks, sidings, etc. It does not include yard or shop track.

The rail transit agency shall prohibit the use of electronic devices that would interfere with the safe operation of revenue or nonrevenue rail vehicles.

The rail transit agency shall require unauthorized electronic devices to be powered off and stowed off the person and out of sight while operating revenue or nonrevenue rail vehicles.

A rail transit agency, by policy, may allow operators of revenue and nonrevenue rail vehicles to use unauthorized electronic devices in an agency-authorized situation only when the rail vehicle is stopped. Rail transit agency policy may stipulate additional provisions such as the operator exiting the cab and keying down the train first. The rail transit agency may also stipulate that the device may be used only if no rail transit agency-authorized communications devices are functioning.

A rail transit agency may, by policy, allow the use of electronic devices by operators while the operator is on a layover or break, as long as it is in a safe use location defined by the rail transit agency.

## **1.2 Employees who direct revenue and nonrevenue rail vehicle movement**

The rail transit agency shall prohibit the unauthorized use of electronic devices by any employee in locations including but not limited to an operations control center (OCC), a yard control tower or an interlocking control tower. It shall also prohibit such use by employees who are in direct control over revenue and nonrevenue rail vehicle movement, and/or right-of-way activity.

Electronic device earpieces of any kind shall not be worn inside the OCC, yard control tower or interlocking control tower except for a rail transit agency-approved radio headset/microphone used specifically for its communications system.

The rail transit agency may, by policy, authorize the use of electronic devices by OCC, yard control tower or interlocking control tower personnel in exigent circumstances or for rail transit agency business. Unauthorized electronic devices must be stowed out of sight and off the person, and must be powered off.

The rail transit agency shall identify requirements related to the storage and/or usage of electronic devices.

## **1.3 Roadway worker activity**

The use of electronic devices of any kind that would interfere with the safe performance of right-of-way maintenance and inspection activities shall be prohibited.

In some cases the use of job-related electronic devices—including but not limited to survey equipment or gauge measuring equipment—is required. In those circumstances the necessary electronic device shall be used only by properly trained personnel and only with safety precautions in place supporting the use of the electronic device in a safe use location (established in accordance with rail transit agency roadway worker



protection policies). If an electronic device is to be used as part of the work, its use shall be identified in the job briefing. The rail transit agency shall consider provisions covering other uses of electronic devices by roadway workers in unique cases, such as construction of a new line where radio coverage may not yet exist or where use of other technologies may be needed.

## **1.4 Stations, yards and maintenance facilities**

The rail transit agency shall establish safe use locations for authorized electronic device usage within stations, yards and maintenance facilities. The rail transit agency shall prohibit the unauthorized use of electronic devices when not in an established safe use location. If job-related use of electronic devices is required, the necessary electronic device (meters, laptops, etc.) shall be used only by properly trained personnel and only with safety precautions in place established in accordance with rail transit agency equipment inspection/maintenance policies.

The rail transit agency shall identify designated locations where employees may be permitted to use personal electronic devices that are otherwise prohibited by the rail transit agency.

## **1.5 Other vehicles**

A rail transit agency may, by policy, prohibit the use of electronic devices by employees while operating other rail transit agency vehicles such as on-track equipment (OTE) or nonrevenue motor vehicles, as defined by the rail transit agency.

## **1.6 Exceptions**

Situations may arise when rail transit agency–authorized communication devices, such as portable or onboard radios are non-functioning, or when the use of a camera can convey or capture critical information.

The rail transit agency shall evaluate including provisions in its policy that allow for exceptions to electronic device prohibitions. If any exceptions are determined to be permissible, the rail transit agency shall clearly define when such use may be allowed and whether the rail transit agency requires obtaining any permission, making any special notifications or taking other steps.

# **2. Authorized electronic devices**

The rail transit agency shall develop a policy that prohibits the use of electronic devices unless such a device has been provided for the operation or has been specifically authorized for use by the rail transit agency. The rail transit agency policy shall specify that any electronic device may be used by the affected employee only when and where it is safe to do so, and should not create a distraction that could expose the employee or others to danger.

The rail transit agency shall define authorized use of electronic devices by any individual in the operating compartment who is not operating the rail vehicle.

## **2.1 Agency-issued two-way radios**

Rail transit agency–issued two-way radio communication devices are designed to provide critical communications among field employees, supervisors and/or the OCC. As such, two-way radios are exempt from the specific restrictions identified for electronic devices.

## **2.2 Agency-issued mobile phones, tablets or other electronic devices**

The rail transit agency may issue and authorize mobile phone, tablet or other electronic device usage by agency employees. The rail transit agency shall develop a policy specifying the authorized uses and storage of such devices.

## **2.3 Exceptions**

The rail transit agency shall determine if any exceptions apply, such as for personal electronic devices that may not be considered to be distracting, such as fitness trackers. The rail transit agency policy for any such allowance shall align with any requirements related to medical device use.

## **3. Rule compliance program**

The rail transit agency shall implement a compliance program for the oversight of the electronic device distraction policy in accordance with the provisions of APTA RT-OP-S-011-10, “Rule Compliance Program Requirements.”

The rail transit agency shall establish its requirements and protocols for identified employee noncompliance, which may include corrective action or enforcement actions.

## **4. Training and familiarization**

The rail transit agency shall identify protocols for familiarizing and/or training employees subject to the electronic device distraction policy and explaining consequences related to violation of the policy. The rail transit agency shall identify any recertification/requalification/retraining requirements.

## **5. Medical exceptions**

The rail transit agency shall consider the need for any medical exceptions and coordinate with the appropriate parties to identify and document any differences in electronic device distraction policy requirements under these circumstances.

The rail transit agency shall establish a process for evaluating and granting medical exception requests.

The rail transit agency shall ensure that its policy complies with pertinent medical privacy laws.

## **6. Hazard analysis for new uses of electronic device technology**

The rail transit agency shall undertake a hazard analysis when considering new requirements that may allow for certain uses of rail transit agency–issued/authorized electronic devices while operating a train or being in a position to control train movement.

## **7. New technologies**

The rail transit agency shall consider the ever-changing technologies in evaluating the currentness of the program and making sure the program is up to date.

## **Related APTA standards**

**APTA RT-S-OP-011-10**, “Rule Compliance Program Requirements”

**APTA RT-S-OP-016-10**, “Roadway Worker Protection Program Requirements”

**APTA RT-OP-S-021-15**, “On-Track Equipment Safety Requirements”

**APTA BTS-BS-RP-005-09**, “Reducing Driver-Controlled Distractions While Operating a Vehicle on Agency Time”

## **References**

Code of Federal Regulations:

49 CFR Part 220, Railroad Communications

49 CFR Part 673, Public Transportation Agency Safety Plans

49 CFR Part 674, State Safety Oversight

## **Definitions**

**authorized device:** Any electronic device issued by the rail transit agency and identified by the rail transit agency as authorized for use either at specified times or in specified circumstances.

**electronic device:** Devices including but not limited to mobile phones; tablets; electronic wearable devices, such as smartwatches, which transmit any information or communications in addition to date or time; music and/or photo download devices; electronic ear devices of any kind (except prescribed hearing aids); headphones, earbuds or any device that projects sound; portable computing devices; ancillary devices associated with an electronic device; and any future devices known by other names and serving other purposes that may distract from safe working practices.

**employee:** A person employed directly, or by contract, by the rail transit agency. For purposes of this standard, the same as the FTA term *transit worker*.

**nonrevenue vehicle:** A train or other rail-mounted equipment not designated to carry passengers.

**operator:** The onboard employee who controls the movement of a train or other rail-mounted equipment.

**rail transit agency:** The organization that operates rail transit service and related activities. Also known as the *transit system*, *transit agency*, *operating agency*, *operating authority*, *transit authority* and other similar names.

**rail vehicle:** A self-propelled vehicle equipped with flanged wheels.

**revenue vehicle:** A rail transit vehicle designed to carry passengers.

**right-of-way:** The area at track level or above track level at a distance from the centerline of the tracks as specified by the rail transit agency.

**safety-critical:** Describes a task that, if not performed correctly, increases the risk of damage to equipment or injury to a passenger, crew member or other person.

**safe use location:** An area away from moving revenue and nonrevenue rail vehicle and equipment as determined by the rail transit agency, where an employee is authorized to use an electronic device.

**supervisor:** One who oversees the activity of work or workers.

**APTA RT-S-OP-017-11, Rev. 2**  
**Electronic Device Distraction Policy Requirements**

**unauthorized use:** The usage of electronic devices not directly related to specific job duties or the use of job-related electronic devices in a way that would create an unsafe condition.

## Abbreviations and acronyms

**FTA**        Federal Transit Administration  
**OCC**        operations control center  
**SSPP**       system safety program plan

## Document history

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