MBTA SAFETY RULES COMPLIANCE PROGRAM INSPECTION PROCEDURE AND FORM

Department(s):	Persons notified when there is a	Rules Compliance Staff:
Subway Operations	violation:	One RTL Supervisor, RTL
RTL Line Specific	OCC Dispatcher	Instructor, or RTL Official.
	On duty Line Supervisor	Optional: A Safety or DPU
	Line Superintendent	Representative
Element 14.1–Rules Compliance:	Superintendent of Subway Training	RCP-006
RTL Door Observation	MBTA Safety	7/15/13 Rev 3

Reference Criteria:

- SSPP 4.5 Operators/Maintenance Personnel Obey established Authority rules and "standard operating procedures."
- SSPP 8.0 Subway Operations employees are governed by specific rules and procedures so they may safely perform their duties in a manner consistent with MBTA Policy.

Element/Characteristics and Method of Verification:

This observation verifies that train crews follow the rules and proper procedures for compliance with Subway Operations rules.

- The Rules Compliance Staff stands in a platform location where you can observe all aspects of door operations and boarding procedures.
- In order to perform the test, the Rules Compliance Staff must have the required PPE and/or equipment needed to perform the RCP Observation at the scheduled starting time.
- Examples of PPE and/or equipment needed: testing compliance form; Fitness for Duty form; statement form; pen; working portable radio, etc.

Testing and Observations:

The Rules Compliance Staff observes all aspects of door operations looking for the following violations:

- Employee sitting and/or without his/her head out of the cab window when opening/closing doors
- Employee not confirming all pilot lights are lit when servicing the station and/or extinguish before departing the station
- Customer hit by the doors when boarding and alighting the train
- Test Rules Compliance Staff have no latitude in recording rules violations. What is observed is what is recorded.
- Written in ink, fully complete the form for the observation. Write data in neatly and do not abbreviate the vehicle's direction or the words Yes/ No in the Compliant columns.
- If any violation is observed, the employee must be re-instructed prior to leaving the station and checked for Fitness for Duty. If it is not possible to re-instruct and check the employee before train departs, notify the OCC Dispatcher to attempt to stop the train and have the nearest Supervisory Employee perform the task.
- If due to a violation a re-instruction statement or fitness for duty form is required by the Test Rules Compliance Staff or another employee (see above bullet), it must be attached to the RCP Observation Form when submitted to the Area's Supervisory Staff and/or Superintendent.
- Test Rules Compliance Staff must personally ensure that the original form is received by the Area's Supervisory Staff and/or Superintendent.
- If other rule violations are observed, the Test Rules Compliance Staff must immediately take action to stop or otherwise appropriately address the violation. The other violation should be documented and followed up on as required by rules and procedures. Do not document on this Inspection Form.
- Original forms are to be kept at the Area Superintendent's office.

Comments/Corrective Action:

• If any violation is observed, the employee must be re-instructed and checked for Fitness for Duty by Supervisory Personnel.