ATTACHMENT 4

VEHICULAR PURSUIT OF SUSPECTS FLEEING ON FOOT OR BICYCLE

In the past year, the CPRB has received and investigated several complaints involving OPD officers pursuing suspects fleeing on foot or bicycle in their patrol vehicles. In each of these incidents, the appointed Board has expressed severe reservations about the actions of subject officers, and have questioned both tactics and the context of the decision to pursue, however no specific allegations related to these decisions have led to Sustained findings of officer misconduct. The reason for the lack of Sustained findings in these incidents should not be construed as an endorsement of the tactics of OPD officers in these cases however, rather they highlight a gap in current OPD policy and training which does not address the specific case of a pursuit in which the officer is in a patrol vehicle while the fleeing suspect is on foot or bicycle. The lack of either a specific policy addressing these pursuits or the formal application of either the OPD's Vehicle Pursuit Policy, or Foot Pursuit Policy to decisions to engage in these hybrid pursuits means that conduct which would be otherwise prohibited if both the officer and fleeing suspect engaged in the same modes of transportation (foot/bicycle or vehicle), instead fall into a policy vacuum which does not allow for disciplinary action related to the specific decision to pursue except when some other violation of policy is involved.

In reviewing these incidents, the Board has appreciated that such pursuits may be justified, however the justifications for such pursuits have often been deemed insufficient when compared against the risks to both the officers involved in the decision to pursue and to the public. In specific incidents that have generated complaints reviewed by the CPRB, the probable cause used to justify the "hybrid" pursuit have – in every case – been based on suspected criminal activity that is well below the threshold of posing an immediate danger to public health or safety which would be required under either the Vehicle or Foot pursuit policies, and have often involved low level drug transactions and other crimes which would otherwise be treated as low-priority arrests.

Additionally, specific complaints have involved incidents in which officers have, during a pursuit of suspects fleeing on foot or bicycle, employed tactics the appointed Board have deemed to be inappropriate methods for accomplishing the stated goal of apprehending suspects while minimizing dangers to themselves and others. These specific tactics include but are not limited to:

1) Employing the vehicle pursuit tactic of "channeling" – defined as the usage of a patrol vehicle to constrain the range of action of the fleeing suspect by actively blocking movement in certain directions – which is designed and more appropriately employed in the context of vehicular pursuits.
2) Driven patrol vehicles onto sidewalks and public areas designed for foot traffic to more quickly apprehend fleeing suspects.

Suspect officers involved in disciplinary review have even gone so far as to describe their choice of tactics using terms related to vehicle pursuit training and policy, while clarifying that these descriptors did not apply in the incidents under review because they were not engaged in a vehicle pursuit.

Furthermore, in several of these incidents, the pursuits under review have occurred in locations with large numbers of bystanders and have generated multiple citizen complaints about single incidents relating either to the perceived dangers to uninvolved pedestrian and bicycle traffic, or to accusations that police vehicles have been used to "hit" fleeing subjects. Therefore, these incidents – even where they do not lead to specific incidence of harm – should be understood in the context of both their high visibility and public perceptions of the inappropriateness of the tactics and potential dangers as expressed through the generation of multiple public complaints of misconduct filed with the CPRB and IAD.

To date, the CPRB has not reviewed a single incident where a collision between an officer in a patrol vehicle and a suspect fleeing on foot or bicycle can be determined to have occurred, however the potential for accidental contact when involved in such pursuits is perceived to be high, and poses grave dangers to both the public and to the officers engaged in such tactics. A contact between patrol vehicle and pedestrian (or bicyclist) is – under OPD departmental policy and the laws of the State of California – deemed to be a level 1 [deadly] Use of Force. Therefore, where even the possibility for accidental contact exists, departmental policy and training should emphasize that pursuits of suspects fleeing on foot or bicycle employing patrol vehicles are both dangerous to the public and potentially subject to the highest levels of official review and legal scrutiny.

Over the past decade a significant effort has been made to improve the tactics of OPD personnel involved in vehicular pursuits (of suspects fleeing in vehicles), and to limit an officer's ability to initiate such pursuits to incidents where the fleeing suspect is believed to have engaged in ***"violent forcible crimes and/or crimes involving the use or possession of firearms"*** (OPD Vehicle Pursuit Policy DGO J-4). Likewise, the California Lexipol policy for foot pursuits, in which both the fleeing suspect and the pursuing officer are on foot (and/or bicycle) is clear in establishing that ***"It is the policy of this [department] when deciding to initiate or continue a foot pursuit that [officers/ deputies] must continuously balance the objective of apprehending the suspect with the risk and potential for injury to department personnel, the public or the suspect. [Officers/Deputies] are expected to act reasonably, based on the totality of the circumstances. Absent exigent circumstances, the safety of department personnel and the public should be the primary consideration when determining whether a foot pursuit should be initiated or continued. [Officers/Deputies] must be mindful that immediate apprehension of a suspect is rarely more important than the safety of the public and department personnel."*** (Lexipol California foot pursuit draft policy 2015)

It is therefore the belief of the appointed Board of the CPRB that the language which applies to Vehicle and Foot pursuits must explicitly extend to the case in which the officer making the decision to pursue is in a patrol vehicle and the suspect is fleeing on foot or bicycle. Officers involved in such pursuits should have more than probable cause of a minor violation, and should be expected to exercise the same standard of review to balance the payoff of apprehension based on the severity of the suspected criminal activity against potential dangers to the public and to the officer themselves given the small margins for error involved in potential collisions between motor vehicles and pedestrians.

Furthermore, whereas the City of Oakland has embraced pedestrian traffic and actively encourages bicycle use through several city-wide programs and initiatives, the Board believes that the likelihood that problematic interactions between officers in patrol vehicles and suspects on foot or bicycle are likely to increase in the years ahead. The Department would therefore be well served to engage in a review of departmental policies related to pursuits of suspects using these methods of transportation now rather than waiting for an incident or accident in which the outcomes of the decision to engage in a mixed-mode pursuit leads to actual harm to the public or the officers of the OPD.

OPD Vehicle Pursuit Policy

DEPARTMENTAL GENERAL ORDER J-4 Pursuit Driving

Effective Date 25 Aug 14

The purpose of this order is to establish Departmental policy and procedures for vehicle pursuits.

I. VALUE STATEMENT

The protection of human life shall be the primary consideration when deciding to engage in a vehicle pursuit. Vehicle pursuits are inherently dangerous, but at times may be necessary to apprehend dangerous criminals who evade police in an attempt to escape. ***However, the decision to engage in a vehicle pursuit to immediately apprehend a fleeing suspect requires a careful weighing of the risks to the safety of officers, motorists, bystanders and the general public versus the benefit to public safety. Therefore, this policy only allows vehicle pursuits for violent forcible crimes and/or crimes involving the use or possession of firearms.***

II. ENGAGING IN A VEHICLE PURSUIT

A. What is a vehicle pursuit

A Vehicle Pursuit is an event involving one or more law enforcement officers attempting to apprehend a suspected or actual violator of the law in a motor vehicle while the driver is using evasive tactics, such as high speed driving, driving off a highway or turning suddenly and failing to yield to the officer's signal to stop.

B. When a pursuit may be initiated

Vehicle pursuits may only be initiated when there is reasonable suspicion to believe the suspect committed a violent forcible crime (See Appendix A) and/or a crime involving the use of a firearm, or probable cause that the suspect is in possession of a firearm. A monitoring commander may authorize a pursuit for a crime not involving a violent forcible crime or firearms, under exigent circumstances, when the fleeing suspect's actions pose an immediate and serious threat to officers and the public. A pursuit report shall be completed and forwarded to the Department Safety Coordinator for all pursuits initiated under exigent circumstances and shall go before the Department Safety Committee for a full review to determine policy compliance.

C. When a pursuit must be terminated

Pursuits shall be terminated whenever the totality of circumstances known or which should be known to involved personnel during the pursuit indicate that the risks in continuing the pursuit reasonably appear to outweigh the risks resulting from terminating the pursuit.

III. RISK FACTORS

Involved personnel shall consider all Risk Factors, in determining whether to initiate and continue a vehicle pursuit, including but not limited to:

1. The volume of vehicular and pedestrian traffic in the area;
2. Traffic conditions;

3. Location of pursuit;
4. Safety of the public in the area of the pursuit (e.g., the presence of children, the elderly or disabled, the proximity to hospital or school zones in the vicinity of the pursuit);
5. Safety of the pursuing officers;
6. Speeds of both officer and suspect vehicles;
7. Familiarity of the officer and supervisor with the area of the pursuit;
8. Road and weather conditions;
9. Time of day;
10. Quality of communications between the pursuing units, the Communications Section, and/or supervisor;
11. The performance capabilities of the police vehicle or the operation of the emergency lights and siren
12. Availability of air or field support;
13. Whether the officer has a ride-along passenger with him/her;
14. Whether the suspect is known and can be apprehended at a later time;
15. Whether the suspect is known to be a juvenile;
16. When a non-suspect vehicle and/or pedestrian accident has occurred during a pursuit;
17. The safety of occupants in the fleeing vehicle;
18. The distance between the pursuit and fleeing vehicles is so great that further pursuit is futile; and
19. The pursued vehicle's location is no longer known.

IV. DUTIES OF INVOLVED PERSONNEL

"Involved personnel" refers to officers, supervisors and commanders who are involved in the pursuit of the fleeing suspect or making command and control decisions relative to the pursuit. A supervisor or commander, who becomes engaged in the pursuit, shall relinquish his/her supervisory control to an uninvolved supervisor or commander as soon as reasonably practical. A passenger officer in a pursuit vehicle is considered involved personnel and shall be held accountable for advising the driver whenever a pursuit should be terminated. Involved personnel shall comply with all other policy requirements including the driving rules, notification and reporting requirements.

A. Initiating a pursuit

1. When initiating a pursuit, involved officers must ensure there is: ***a. Reasonable Suspicion the pursuit is for a violent forcible crime and/or a crime involving the use of a firearm; or b. Probable Cause that the suspect is in possession of a firearm.***

2. All vehicle pursuits shall be conducted with red light and siren, as required by 21005 VC, and with due regard and caution for the safety of all persons using the highway, as required by 21056 VC.

3. During a pursuit, involved officers and monitoring supervisors/commanders shall continually consider the Risk Factors and whether the pursuit should be terminated in order to protect officers and the public from the risks associated with the pursuit. All involved personnel may be required to explain their decision making and analysis of the risk factors.

Lexipol Foot Pursuit Policy

Lexipol California DTB Date: 2015/08/04 Foot Pursuit Policy - Guidelines ***DRAFT*** 11 Printed Date: 2015/08/13 © 1995-2015 Lexipol, LLC 458.1.1

458.3 GUIDELINES FOR FOOT PURSUIT ***Unless the [officer/deputy] reasonably believes that exigent circumstances exist (e.g. a serious threat to the safety of personnel or members of the public), [officers/deputies] should consider alternatives to engaging in or continuing a foot pursuit*** under the following conditions:

(a) When directed by a supervisor to terminate the foot pursuit. Such an order shall be considered mandatory

(b) When the [officer/deputy] is acting alone.

(c) When two or more [officers/deputies] become separated, lose visual contact with one another, or obstacles separate them to the degree that they cannot immediately assist each other should a confrontation take place. In such circumstances, it is generally recommended that a single [officer/deputy] keep the suspect in sight from a safe distance and coordinate the containment effort.

(d) The [officer/deputy] is unsure of his/her location and direction of travel.

(e) When pursuing multiple suspects and the pursuing [officers/deputies] do not reasonably believe that they would be able to control the suspect should a confrontation occur.

(f) When the physical condition of the [officers/deputies] renders them incapable of controlling the suspect if apprehended.

(g) When the [officer/deputy] loses radio contact with [the Communications Center] or with backup [officers/deputies].

(h) When the suspect enters a building, structure, confined space or a wooded or otherwise isolated area and there are insufficient [officers/deputies] to provide backup and containment. The primary [officer/deputy] should consider discontinuing the pursuit and coordinating containment pending the arrival of sufficient [officers/deputies].

(i) The [officer/deputy] becomes aware of unanticipated or unforeseen circumstances that unreasonably increase the risk to [officers/deputies] or the public.

(j) The [officer/deputy] reasonably believes that the danger to the pursuing [officers/deputies] or public outweighs the objective of immediate apprehension.

(k) The [officer/deputy] loses possession of his/her firearm or other essential equipment.

(l) The [officer/deputy] or a third party is injured during the pursuit, requiring immediate assistance, and there are no other emergency personnel available to render assistance.

(m) The suspect's location is no longer definitely known.

(n) The identity of the suspect is established or other information exists that will allow for the suspect's apprehension at a later time, and it reasonably appears that there is no immediate threat to department personnel or the public if the suspect is not immediately apprehended.

(o) The [officer/deputy]'s ability to safely continue the pursuit is impaired by inclement weather, darkness or other conditions.

POLICY

It is the policy of this department when deciding to initiate or continue a foot pursuit that [officers/ deputies] must continuously balance the objective of apprehending the suspect with the risk and potential for injury to department personnel, the public or the suspect. [Officers/Deputies] are expected to act reasonably, based on the totality of the circumstances. Absent exigent circumstances, the safety of department personnel and the public should be the primary consideration when determining whether a foot pursuit should be initiated or continued. [Officers/Deputies] must be mindful that immediate apprehension of a suspect is rarely more important than the safety of the public and department personnel.

OAKLAND POLICE DEPARTMENT PERSONAL DIGITAL RECORDING DEVICE (PDRD) POLICY

The Oakland Police Department was an early adopter of body-worn police cameras, and the deployment of these cameras has taken an increasingly central role in both police investigative work in Oakland, and in the review of allegations of Officer misconduct by both the OPD Internal Affairs Division and the independent Citizens' Police Review Board. As the professional staff and appointed Board of the CPRB have grown accustomed to the important role of the body-worn camera in the exercise of police oversight however, they have also reviewed incidents in which current policies and training have failed to maximize the full potential of this technology both as a tool for investigators and as a method of documenting police procedure and improving departmental transparency to an often-mistrustful public.

As part of its ongoing policy review process, the Oakland Police Department is currently engaged in an extensive review of PDRD related policy and training. It is therefore an appropriate time for the CPRB to re-emphasize past policy recommendations regarding PDRD deployment and usage and to forward all additional recommendations to the appropriate authorities within the OPD. These recommendations span a range of issues having to do with PDRD deployment, activation and de-activation; and requests for additional training of officers emphasizing the importance of PDRD evidence both for public transparency and to document mandated tasks that frequently generate citizen complaints. The appointed Board of the CPRB believes the adoption of these proposed changes to PDRD policy and training is vital to facilitate the review process and minimize recurrent problems of miscommunication, conflicting statements, and gaps in the investigatory record that affect both investigations of officer misconduct and OPD investigations of criminal behavior.

On Tuesday, July 18, 2017, members of the CPRB staff met with Timothy Birch, who leads the Office of Research and Planning within the Oakland Police Department Office of Chief of Police, to discuss the current OPD PDRD policy review process. Both outstanding CPRB policy recommendations and additional recommendations that have been generated this year relating to the deployment of PDRDs by members of the department were discussed, and several of the CPRB's standing recommendations have already been included in proposed policy language as part of the review process. This summary constitutes a full list of specific changes to OPD PDRD policy generated by the appointed Board of the CPRB which were discussed at this meeting and have been forwarded to the Department.

These specific CPRB PDRD policy recommendations can be broken down into 3 broad categories: PDRD activation/deactivation during regular patrol and investigatory functions; video documentation of police vehicle stops – especially related to faulty equipment related stops; and the use of PDRDs during the execution of property searches. In all three categories, the Board has advocated for increased usage of video documentation employing the PDRD technology to increase transparency and improve the review process. Additionally, the Board emphasized – and staff discussed with OPD policy personnel – the need for expanded training of officers to improve the quality and investigatory value of such video documentation.

Summary of PDRD Policy Recommendations based on CPRB Investigations

A) PDRD Activation (general)

1) Officer PDRDs should be activated for all contacts between officers and the public. (subject to restrictions on recordings of minors and other special circumstances)
2) PDRDs should be activated to document citizen contacts to confirm or dispel a suspicion that the citizen may be involved, as a suspect ***or witness*** in criminal activity.
3) Officers shall activate their PDRD to document all welfare checks

Statement Taking

4) Members shall activate PDRDs when taking statements from ***officers*** in the same manner that such activation is used when taking statements from the public. While this should not be construed to limit existing expectations with respect to an officer's duty to file written statements, interviews of witness and subject officers conducted by supervisors in the field should be treated with the same level of care and with the same requirements of video documentation as they would be if conducted in the context of departmental review at police headquarters.

B) Documentation of Vehicle Stops

Where possible PDRDs should be activated to positively document the basis for all vehicle stops involving faulty equipment. Officers documenting the basis of vehicle stops using their department issued PDRDs should assure that the faulty equipment being document is clearly visible and sufficiently lit in the video as to provide sufficient video documentation for subsequent investigations or incident reviews.

C) Documentation of Police Searches

OPD should document all searches and services of warrants with PDRD or other recording devices. Specifically:

1) Officers shall record the service of any warrant to those individuals who are legally entitled to such a warrant, and shall document that a copy of the warrant remains on the property after the search is complete.
2) Officers should activate and record all areas that are the subject of a warrant search both pre- and post-search with special focus on any changes to the search area and any damage or breakage caused by the search.
3) All pre- and post- recordings of areas searched by OPD personnel should be conducted with sufficient lighting, pace and detail as to assure a record is captured which will be probative in the case of further investigation or after-action review.
4) Officers employing PDRDs to document searches, both pre- and post- search sweeps and evidence searches, should be trained in providing high-quality contemporaneous narration of the subject of the video. This should include a verbal description of the specific items/areas

being captured on video where these are deemed relevant to the investigation and a general narration providing details with respect to the areas/rooms being examined as the camera documents these areas.

5) Where searches are conducted either by sworn or unsworn personnel who have not been issued a personal PDRD, the department should make every reasonable effort to make a PDRD available for filming purposes. Such PDRDs may either be issued specifically for such purposes prior to deployment of the search team; or, where a specific search PDRD is not available, search personnel should be allowed to use the PDRDs of sworn personnel on scene or be accompanied by a member with a PDRD to insure the existence of pre- and post-video documentation of applicable search areas.
6) PDRDs used to document searched areas post search shall not be de-activated until the searches requiring activation have concluded and the member believes they will have no further interaction with the person, ***and the property being searched has been properly secured. A post search video must document that OPD personnel involved in the search have properly secured, or have made a good faith effort to properly secure, all properties subject to the search.***

RELEVANT PORTIONS OF CURRENT OPD PDRD POLICY

DEPARTMENTAL
GENERAL
ORDER

I-15.1

Index as:

Portable Video Management System

Effective Date
16 July 15

Evaluation Coordinator:
Information Systems Manager

Evaluation Due Date:
18 Jan 16

Automatic Revision Cycle:
2 Years

PORTABLE VIDEO MANAGEMENT SYSTEM

The purpose of this order is to set forth Departmental policy and procedures for the Portable Video Management System (PVMS), which includes a Portable Digital Recording Device (PDRD), designed to record both audio and video of field activity.

Progressive police departments are increasingly utilizing a variety of audio/video technology to further the mission of their departments. The Oakland Police Department has adopted PDRD technology because of its flexibility to capture audio/video evidence and enhance the Department's ability to conduct criminal investigations, administrative investigations, and review police procedures and tactics.

I. POLICY

A. All personnel in an assignment with primarily field based responsibilities, as determined by the Chief of Police (COP), shall be assigned a PDRD for the duration of the assignment.

Other personnel, as determined by the COP, may also be assigned a PDRD.

B. All personnel assigned a PDRD shall carry and use the PDRD in accordance with the provisions of this order.

C. All PDRD files are the property of the Oakland Police Department. Unauthorized use, duplication, editing, and/or distribution of PDRD files is prohibited.

D. Personnel shall not delete any PDRD file, except as specified in Part VII, C.

E. Personnel shall not remove, dismantle or tamper with any hardware/software component or part of the PDRD.

F. Personnel are prohibited from wearing or using personally owned video recording devices in place of or in conjunction with an assigned PDRD.

G. The Project Resource Management Unit is designated as the Custodian of Record for all PDRD data files.

H. Personnel shall not intentionally use the PDRD recording functions to record any personal conversation of, or between another member/employee without the recorded member/employee's knowledge.

I. Personnel shall not intentionally use the PDRD to record at Department facilities where a reasonable expectation of privacy exists (e.g., bathrooms, locker rooms, showers) unless there is a legal right to record and a Departmental requirement to record.

J. Part II also applies to cover officers.

II. PDRD ACTIVATION AND DE-ACTIVATION

A. Required activation

Members shall activate their PDRD under any of the following circumstances:

1. Citizen contacts to confirm or dispel a suspicion that the citizen may be involved, as a suspect, in criminal activity;

2. Detentions and Arrests;

3. Assessment or evaluation for a psychiatric detention (5150 W&I);

4. Involved personnel, as defined by DGO J-4, PURSUIT DRIVING, during a vehicle pursuit;

5. Serving a search or arrest warrant;

6. Conducting any of the following searches of a person and/or property:

   a. Incident to arrest;

   b. Cursory* (i.e., patdown or limited weapons search);

      * Refer to Training Bulletin (TB) I-O.02, THE LEGAL ASPECTS OF SEARCHING PERSONS

   c. Probable Cause;
   d. Probation/Parole;

e. Consent; or

f. Inventory

7. Transporting any detained or arrested citizen (excluding prisoner wagon transports); or

8. Upon the order of a higher ranking member.

Members shall activate their PDRD prior to initiating the circumstances enumerated in Part II. A. 1-7, above.

B. Crowd Control Operations

During crowd control, protest or mass arrest incidents members shall use their PDRD consistent with this policy, and when directed by the Incident Commander. The Incident Commander shall document their orders in an appropriate report (e.g. Operations Plan or After Action Report) and provide the orders to all personnel.

C. PDRD Activation is not required under any of the following circumstances:

1. Members taking a report when the information available to them indicates the suspect is not on the scene;

2. During a preliminary investigation with a child abuse victim or a victim of a sexual assault;

3. Members meeting with any Confidential Informant, as defined in DGO O-4, INFORMANTS; or

4. Members on a guard assignment at a Police, Medical, Psychiatric, Jail or Detention facility. Members shall assess the circumstances (e.g., suspect's demeanor/ actions, spontaneous statements, etc.) of each guard assignment, on a continuing basis, to determine whether to discretionarily activate or de-activate their PDRD.

D. De-activation of the PDRD

1. Members shall not de-activate their PDRD, when it was activated as required by this policy, until one of the following occurs:

a. Their involvement in the citizen contact, arrest or detention has concluded or becomes a hospital guard (see part II, C, 4 above);

b. They receive an order from a higher ranking member;

c. They are discussing administrative, tactical or law enforcement sensitive information away from the citizen;

d. They are at a location where they are not likely to have interaction or a chance encounter with the suspect (e.g. outer perimeter post, traffic control post, etc.);

e. The searches requiring activation as enumerated in Part II, A have concluded and the member believes they will have no further interaction with the person;

f. They reasonably believe the recording at a hospital may compromise patient confidentiality;

g. A pursuit has been terminated and the member performs the required actions, as specified in DGO J-4, or notifies Communications they are in-service; or

h. They are interviewing an informant for the purpose of gathering intelligence. At the conclusion of the interview, the PDRD shall be re-activated until no longer required by policy.

i. They are meeting with an undercover officer. At the conclusion of the meeting, the PDRD shall be re-activated until no longer required by policy.

After a member de-activates their PDRD, it is their responsibility to ensure they re-activate their PDRD should the circumstances require it.

2. Statement taking

Personnel are authorized to use the PDRD to record statements in lieu of taking a written statement. PDRDs, however, shall not be used to record statements from child abuse or sexual assault victims.

a. Personnel shall advise or obtain consent from victims or witnesses when taking a PDRD recorded statement.

b. PDRD statements shall be recorded as an individual separate file, baring exigent circumstances. Therefore, during a required activation, where none of the de-activation criteria have been met, members may temporarily de-activate their PDRD to record individual separate statements.

c. Personnel shall follow the steps below when de-activating their PDRD for statement taking:

1). Prepare to immediately take the statement;

2). De-activated the PDRD then immediately re-activate the PDRD and begin taking the statement.

3). Upon completion of the statement, de-activate the PDRD then immediately re-activate the PDRD, if continued recording is required.

Members shall repeat the above steps when de-activating/activating their PDRD to take multiple statements.

d. Personnel whose PDRD is not already activated shall activate it before and deactivate it after each statement is taken to create a separate individual file.

Refer to Report Writing Manual (RWM) S-01, STATEMENTS.

E. Discretionary Activation and De-Activation

Members, when not prohibited from or required to activate their PDRD, may use their own discretion when deciding to activate and de-activate the PDRD.

III. USE OF THE PORTABLE VIDEO MANAGEMENT SYSTEM

A. PDRD Operability

Members shall not utilize or wear a PDRD unless it is properly functioning. If at any time, after deploying to the field, a PDRD malfunctions or becomes inoperable it shall be replaced as soon as practical.