
 Marathon Petroleum Company LP		REFINERY-WIDE		R-11-001
ANACORTES REFINERY		Safe Use of Electronic Devices		Page 1 of 14
RESPONSIBLE DEPT.	CONTENT CUSTODIAN	APPROVED BY	LEGACY NUMBER:	
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REVISION APPROVAL DATE: 12/17/2024		NEXT REVIEW DATE: 12/17/2029		MOC: N
				REVISION: 2

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1.0 INTRODUCTION

1.1 Purpose

The purpose of this policy is to provide guidance on the use, control of, and approval process for Electronic Devices inside and within the refinery.

This standard applies to normal operations, shutdown/turnaround operations, and major project work at the Anacortes Refinery.

1.2 Scope

- This Policy applies to all personnel, employee or contractor, and visitors, visiting or working in or on Marathon Petroleum Co. LP owned, operated, or maintained facilities including, but not limited to, refineries, pipelines and pipeline rights-of-way, terminals, loading racks, tank farms, docks, and wharfs.
- This policy applies to the acceptable use of Company Owned, issued and approved Electronic Devices and Personal Electronic Devices.
- Use of an Intrinsically Safe Electronic Device, including any Portable Electronic Product (PEP), which complies with ISA 12.12.03, is permissible when consistent with this policy.
- The use of Personal Electronic Devices, either intrinsically safe or non-intrinsically safe, should be limited to prevent safety hazards in areas that are restricted, have hazardous classifications, or are at high risk for ignition. Any Electronic Device, whether intrinsically safe, Company Approved Electronic Device or non-intrinsically safe, with video, recording or photo capabilities presents a security risk to MPC.

2.0 REFERENCES

The following sections describe references used to generate this Policy.

2.1 Marathon Standards, Policies & Procedures

- Policy 6002, Use of Company and Personal Information Systems for Company Business
- Policy 10006, Recording
- Policy 12002, Internal and External Release of Proprietary Information
- Policy 12003, Responding to the Media
- REF-1056, Safe Use of Electronic Devices
- RSP-1128-000, Safe Work Permit
- RSP-1715-000, Hot Work
- R-11-005, Safe Work Permit

2.2 Government Regulations

- OSHA 29 CFR 1910.307, Hazardous (Classified) Locations
- DHS 6 CFR Part 27, Chemical Facility Anti-Terrorism Standards

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R-11-001.docx	This copy was printed on 3/12/2025

2.3 Industry Standards

- ISA 12.12.03: Standard for Portable Electronic Products Suitable for Use in Class I and II, Division 2, Class I Zone 2 and Class III, Division 1 and 2 Hazardous (Classified) Locations

3.0 DEFINITIONS

The following definitions are applicable to this procedure.

Table 1 Definitions

Term	Description
Company Approved Electronic Devices	Company Approved Electronic Devices are Electronic Devices (other than Contractor Issued Electronic Devices) that are not owned or issued by MPC (i.e., approved personal devices). Use of such devices must be vetted and approved by local management.
Company Issued Electronic Device	Company Issued Electronic Devices are MPC owned or issued Electronic Devices provided to individuals by MPC for business use in the course and scope of providing services to MPC.
Contractor Issued Electronic Device	Contractor Issued Electronic Device is any intrinsically safe or non-intrinsically safe device, including but are not limited to cellular phone, two-way phone/radio, personal data or digital assistant (PDA), iPad, tablet, and similar devices. These Electronic Devices are Issued by their employer and must satisfy the criteria in Section 4.6.2 before they can be brought into or used in a Restricted Area.
Electronic Device	Electronic Device is any intrinsically safe or non-intrinsically safe device, including but are not limited to cellular phone, two-way phone/radio, personal data or digital assistant (PDA), iPad, iPod, tablet, Kindle, smart watch (e.g., Apple Watch), wearable technology (e.g., Google Glass), media streaming devices (e.g., Amazon TV) and similar devices.
Electronic Devices Types	Type 1: MPC Owned or Approved Devices with an MPC Approved Rugged Case or Intrinsically Safe Device Type 2: Approved Contractor Devices with a case that meets all minimum requirements listed below and has an MPC Refining Approved Decal obtained from the Safety Supervisor in Appendix B Type 3: Contractor Issued phones that are not Approved Contractor Devices Type 4: Personal Devices/Cell Phones
Inside or within the Refinery	Inside or Within the Refinery is any area within the perimeter of Company owned, leased, or managed property, up to but not limited to, inside battery limits, process units, operations shelters, tank dikes, docks, satellite buildings, control rooms, control board areas, shops, office buildings, maintenance buildings, turnaround buildings, contractor buildings, warehouses, blast resistant modules, permanent/temporary buildings or structures, whether or not occupied, laydown yards and parking areas.
Intrinsically Safe Device	Intrinsically Safe Device is an Electronic Device clearly identified by or with factory labeling as "intrinsically Safe," "Explosion Proof" or labeled as approved for use in hazardous locations rated as Class I, Division 1 or 2.
MPC Rugged Case	MPC Rugged Case is a case reviewed and pre-approved by the Refining Safety and Security Manager.

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Table 1 Definitions

Term	Description
Personal Electronic Device	Personal Electronic Device is a non-Company owned, issued or approved Electronic Device. Use of such devices must be vetted and approved by local management.
Portable Electronic Device (PEP)	Portable Electronic Product is a battery-powered or photovoltaic cell-powered apparatus that can be hand-held or that is intended for use while worn on a person's body.
PEP1	PEP1 is a body worn electronic product, in direct contact with the skin that is deemed incapable of causing an ignition under normal conditions such as a wristwatch, smart watch, hearing aid, or wrist-worn personal fitness tracker.
PEP2	PEP2 is a portable electronic product that is deemed incapable of causing an ignition under normal conditions, such as approved cellular phones or tablets
Proprietary Information	Proprietary Information is attorney-client privileged information, on-public financial and operating results, trade secrets, patents, intellectual property, licensing agreement or copyrighted material, or information that provides competitive insights to development of systems, processes, products, know-how and technology.
Restricted Area	Restricted areas include areas within the process units (inside battery limits), tank farms, loading racks, wharfs, and effluent plant.

4.0 ROLES AND RESPONSIBILITIES

4.1 MPC Supervision

- Management and Supervision are responsible for enforcing compliance with this Safe Work Instruction.
- Sign approval on the Contractor Approval Form REF-1056-FORM001 (Appendix B)

4.2 Contractor Leadership


- Ensure compliance with this Safe Work Instruction.
- Identify employees permitted to utilize electronic devices and complete REF-1056-FORM001 (Appendix B). It is preferred contractors use the MPC rugged cases in Appendix C.

4.3 Employees & Contractors

- Utilize electronic devices in accordance with this policy.

4.4 Safety Department

- Sign approval on the Contractor Approval Form REF-1056-FORM001 (Appendix B).
- Distribute approved device stickers upon approval.

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5.0 PROCEDURE

5.1 General

- 5.1.1 Only an Intrinsically Safe or Company Approved Electronic Device is permitted within Restricted Area. Company issued devices specifically intended for use within the Restricted Areas, such as radios, PI handhelds, etc., do not require additional approval prior to use.
- 5.1.2 Possession of any personal non-intrinsically Safe Electronic Device whether powered on or off, is strictly prohibited in Restricted Areas, with the exception of personal medical devices. Non-Intrinsically Safe Electronic Devices should be stored and used only in vehicles, offices, locker rooms or designated lunch/break areas.
- 5.1.3 Non-Intrinsically Safe Personal Medical Devices (e.g., insulin pump) require the user to wear a four-gas meter in lieu of obtaining a hot work permit. If the four-gas meter alarms, the person must evacuate immediately to a safe location.
- 5.1.4 Electronic Devices with the exception of radios, may not be used while moving through the unit (e.g., walking or climbing). No external electrical or wireless connections or accessories, including ear buds, headphones, or Bluetooth technologies, are permitted to be used in any Restricted Area. Phone conversations are prohibited where hearing protection is required unless using the speaker phone mode.
- 5.1.5 Use of Electronic Devices in Restricted Areas shall be for business use only. The use of any non-intrinsically safe device requires a valid hot work permit.

5.2 Electronic Device Use in Vehicles within the Refinery

- 5.2.1 Use of any Electronic Device while driving a vehicle or operating equipment within the refinery is strictly prohibited. Prohibited usage includes but is not limited to texting, instant messaging, reading or sending messages or e-mails, receiving or making phone calls, and/or taking pictures, videos or recordings.
- 5.2.2 Use of an Electronic Device within vehicles is permissible when riding as a passenger of the vehicle or equipment is pulled over in a safe location, out of the way of traffic/work, and parked at a complete stop prior to the user engaging in any of the above-listed activities and should serve a legitimate business purpose.
- 5.2.3 Electronic devices whether approved or personal, are prohibited for use while operating a crane, bicycle, man-lift, forklift, golf cart, or anything similar in nature.
- 5.2.4 Delivery drivers can store their Personal Devices/Cell Phones in their vehicle while loading/unloading at units.

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5.3 Personal Electronic Device Use in Central Control Rooms, Blast Resistant Modules, and Operator Boards/Consoles

- 5.3.1 To ensure security and avoid safety distractions, Personal Electronic Devices can only be used or charged at the consoles/boards and Field Operation Centers at the discretion of the Owning Department Manager. Personal Electronic Devices should be stored in vehicles, offices, locker rooms or designated lunch or break areas.
- 5.3.2 Use of Company Electronic Devices or Company Approved Electronic Devices, including Company computer stations in the control rooms, shall be in accordance with Policy 6002.

5.4 Personal Electronic Devices Use in Maintenance Shops

Possession of Personal Electronic Devices, either intrinsically safe, Company Approved Electronic Device or non-intrinsically safe, whether powered on or off is limited in Maintenance Shops at the discretion of the Owning Department Manager. Use of Personal Electronic Devices should be restricted to non-working time, including break periods, in designated lunch or break areas, locker rooms, offices, external parking areas and during transition to and from the gate, such as before and after shift.

5.5 Electronic Device Approval Process

- 5.5.1 Any new type of non-intrinsically safe Company Electronic Devices to be used in Restricted Areas must be approved by the Refining Safety and Security Manager if the device is to be used without a hot work permit in order to determine an appropriate case for the hazard location.

NOTE: The Refinery Safety and Security Manager will use the approval process outlined in Appendix B of REF-1056 Safe Use of Electronic Devices.

- 5.5.2 All Marathon purchased and issued phones must have the Marathon approved rugged case.

5.6 Criteria for Electronic Device Approval


- 5.6.1 Minimum Requirements

In order to use an Electronic Device in a hazardous environment without a hot work permit, the device alone and/or device and case must meet the minimum requirements established in ISA 12.12.03.

- 5.6.2 Portable Electronic Product (PEP) Requirements

The following requirements in this policy classify a device as a Portable Electronic Product (PEP):

- Radio frequency energy transmission limited in accordance with 5.6.5
- No provisions for forced ventilation (e.g., does not contain a fan),
- No sparks visible during operation,
- No camera flash unless it is mechanically disabled,

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- No motors unless it can be demonstrated the motor incorporates non-arcing, and
- No visible damage which compromises the structural integrity of the phone or case.

5.6.3 PEP1 Requirements

PEP1 devices can be used in a classified area without a hot work permit. PEP1 devices must meet the following criteria:

- Powered by a maximum of two button cells,
- Body-worn and in direct contact with the skin, and
- No external electrical connections or accessories are used in the hazardous (classified) location.

Examples: Wrist Watches, Smart Watches, Fitness Trackers, and medical devices (e.g., hearing aids, etc.).

5.6.4 PEP2 Requirements


In order to determine if a PEP can be used in a classified area without a hot work permit, it must be on the list of preapproved devices with/without required protective casing. The Refining Safety and Security Manager and MPC ES&S Attorney will use the following criteria in its evaluation:

- Powered by one or more cells, batteries, or photovoltaic cells,
- Cell or battery secured so it will not fall out in the drop test as described 5.6.6,
- Body-worn or hand held,
- No external electrical connections or accessories are used in the hazardous (classified) location,
- Exposed terminals (for example battery charging terminals) are either recessed or diode protected to prevent a discharge caused by an accidental shorting of these terminals,
- Power switch in accordance with 5.6.7, and
- No damage that exposes the electrical/electronic circuitry as a result of the drop test described in 5.6.6.

Note: PEP2 devices may be used in a classified area with a hot work permit. For PEP2 Medical Devices (e.g., insulin pump), user will wear a four-gas meter in lieu of obtaining a hot work permit.

- If a device or device and case are approved; this device will then be allowed to be used in Class I, Division 2 areas without a hot work permit. Only devices that are approved and labeled will be allowed.
- MPC's Approved Case will be a Black/Yellow Lifeproof Case with the Marathon "M" logo on the back available via Cellular Service.

Note: Approved devices will not be allowed in Class 1, Division 1 areas without a hot work permit. This includes areas where ignitable concentrations of flammable vapors can exist under

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normal conditions, possibly due to operational activities, line-breaks, repair, or leakage.

5.6.5 Radio Frequency

The radiated radio frequency energy from a device, such as a radio or cell phone, is not considered an ignition source if it is below the following limits:

- 2 watt (W) maximum output averaged over 20 microseconds for Groups A and B and Group IIC,
- 3.5 W maximum output averaged over 100 microseconds for Group C and Group IIB, or
- 6 W maximum output averaged over 100 microseconds for Group D and Group IIA

Note: Most cell phones radiate under 2 W so their level of radio frequency radiation is acceptable for PEP2 products.

5.6.6 Drop Test

For PEP2, the device shall be capable of passing a drop test. The test requires the device (or a sample of the product) in the form in which it is intended to be used to be dropped onto a horizontal concrete surface from a height of 2 meters (6 feet 6 inches). The test is repeated six times with the device being dropped in the six orientations that are considered most likely to cause a failure. At the conclusion of the testing, the integrity of the case shall not have been compromised, the battery shall not have fallen out or become disconnected, and the device shall operate as intended.

Note: If the device is in a pre-approved case that has been proven to pass a drop test, the device with its protective case will be deemed acceptable in lieu of performing a drop test on company issued devices.

5.6.7 Power On-Off Switches

Any device with a power on-off switch with contacts that directly interrupt battery current is not acceptable for PEP2 because the switch may cause an ignition-capable arc.


Note: If the switch operator is not a maintained position device and requires the same action for on and off, then it is likely to be an electronic switch. Generally, electronic products use the electronic circuit type of switch.

5.6.8 Contractor Electronic Device Form

See the Contractor Electronic Device Form (REF-1056-FORM01). For the most up-to-date, working copy of this form, go to:
http://cbgrs20/red/copyout.aspx?lib_no=32&doc_no=3701

5.7 Contractor Device Approval Process

5.7.1 Contract Companies with a legitimate business purpose to use Contract-Company issued Electronic Devices in Restricted areas, must have those devices approved by a Department Manager or designee by completing the Contractor Electronic Device form found in REF-1056-FORM01. The Contract

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Company must provide documentation that their device and/or device with case meets the minimum requirements listed below in 5.7.2.

- 5.7.2 Contractor Electronic Devices shall meet one of the following criteria:
- Electronic Devices clearly identified by or with factory labeling as “intrinsically safe”, “explosion proof”, or Labeled as approved for use in hazardous locations rated as Class 1, Div. 1 or 2.
 - Have an approved case with the completed approval form in REF-1056-FORM001 (Appendix B).
 - Obtain a Hot Work Permit.
- 5.7.3 All Contractors who are approved to have a cell phone must possess either an intrinsically safe device or a device in an approved case and the device must have the MPC approval decal in Appendix A.

6.0 SECURITY OF REFINERY


6.1 Recording Proprietary Information with Electronic Devices

- 6.1.1 The use of Electronic Devices to record and distribute Proprietary Information at a refinery shall comply with all policies, including but not limited to Policy 10006, Policy 12002, and Policy 12003, and be consistent with the site Facility Security Plan requirements.
- 6.1.2 Recording is permissible if it otherwise complies with this policy and the recording is for a legitimate business purpose, unless such recording adversely affects or compromises:
- A company trade secret or provides competitive insights to development of systems, processes, products, know-how and technology;
 - Legal patents, intellectual property, licensing agreements or copyrighted material;
 - Attorney-client privileged information, including information related to pending enforcement or litigation;
 - Business development information subject to a confidentiality agreement; or
 - Non-public financial or operational information or results subject to Policy 12002.

7.0 PROCEDURE REVIEW


7.1 Procedure Review

R-11-001 will be reviewed every 5 years.

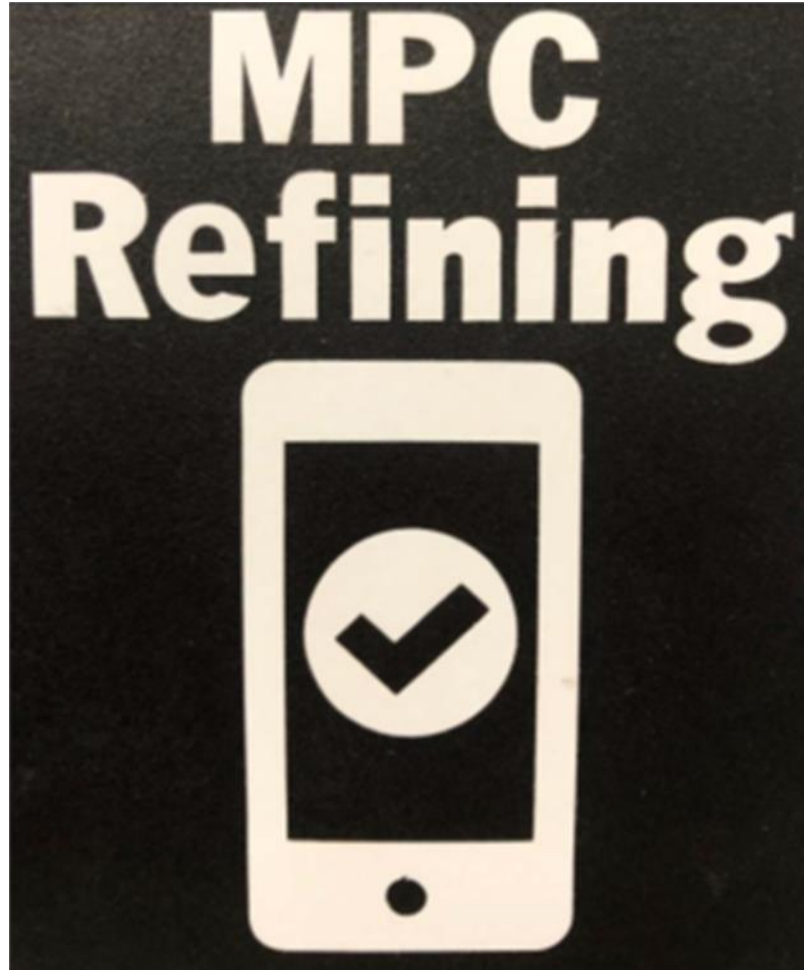
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8.0 REVIEW AND REVISION HISTORY

Revision #	Preparer	Date	Description
0	Mark Willand	10/10/2021	Reformatted and Numbered per Document Control Policy, R-63-001.
1	Darick Brewer	12/21/2021	Revised to include all electronic devices. Line-by-line review.
2	Andrew Johnson	12/17/2024	Line-by-line review – Added approved phone models and updated document custodian.

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9.0 APPENDIX A – MPC REFINING APPROVED DECAL





10.0 APPENDIX B – CONTRACTOR ELECTRONIC DEVICE FORM (REF-1056-FORM001)

Ctrl + Click on image of form to open up an electronic version:

ANSI Section #	ANSI/ISA-12.12.03-2011 "PEP 2" Requirements Applicable to Case	Does the iPhone in a LifeProof Case meet the intent of ANSI/ISA-12.12.03-2011 "PEP 2" ?	Do iPhone (Model #) Specifications Meet Requirement?
6.1(b)	Radio frequency energy transmission limited in accordance with 8.3.		
6.1(c)	No provisions for forced ventilation.		
6.1(d)	No sparks visible in normal operation.		
6.1(e)	No excessive temperatures in normal operation (> 60°C or 140°F).		
6.1(f)	No camera flash unless it can be disabled.		
6.1(g)	No motors unless it can be demonstrated the motor incorporates non-arcing technology.		
6.3(c)	Body-worn or hand-held.		
6.3(a)	Powered by one or more cells, batteries, or photovoltaic cells.		
6.3(f)	Power switch in accordance with 8.2 (no power on-off switch with contacts that directly interrupt battery current).		
6.1(h)	No visible damage.		
6.3(b)	Cell or battery secured so it will not fall out in the drop test as described of 8.1 (2 meter drop).		
6.3(e)	Exposed terminals (for example battery charging terminals) are either recessed or diode protected to prevent a discharge caused by an accidental shorting of these terminals.		
6.3(g)	No damage that exposes the electrical/electronic circuitry as a result of the drop test described in 8.1 (2 meter drop).		
ANSI Section #	ANSI/ISA-12.12.03-2011 Other "PEP 2" Requirements	Does the iPhone in a LifeProof Case meet the intent of ANSI/ISA-12.12.03-2011 "PEP 2" ?	How will we meet these specifications?
6.1(a)	There must be no available listed apparatus suitable for the area classification and capable of performing the intended function (see section 4.12 definition of "listed"). OSHA defines "listed" in 1910.399 as "of a kind mentioned in a list that is published by a nationally recognized laboratory that makes periodic inspection of the production of such equipment, and states that such equipment meets nationally recognized standards or has been tested and found safe for use in a specified manner." Annex B of the ANSI standard, "Potential suitability of selected examples of portable products for use in hazardous (classified) location" does not include cell phones in the "available listed" category, indicating cell phones likely pass the 6.1(a) requirement.		
6.3(d)	No external electrical connections or wired accessories are used in the hazardous (classified) location.		
7.1	A process of administrative control and training is necessary to ensure that portable products do not present an unacceptable risk of ignition when used in hazardous classified areas.		
7.2	The owner/operator of the hazardous (classified) location should establish a process of inspection in which a qualified person establishes that particular products can be accepted as PEP 2.		
7.2	Supporting documentation for PEP evaluations should be maintained for the life of the use of those products. The documentation should include information for the products such as reference number or code, product manufacturer and model, owner name, approver name, and date approved or equivalent information.		
9	Accepted PEP 2 products should be marked as "PEP 2, evaluating company name, supporting documentation reference number."		
<p>The undersigned contractor represents and warrants that the Contractor issued Electronic Device presented for approval complies with all ANSI/ISA-12.12.03-2011 "PEP 2" requirements and that the MPC owning department manager has authorized use of the Contractor issued Electronic Device in the refinery for a legitimate business purpose.</p> <p>Contractor Name: _____</p> <p>By: _____</p> <p>Title: _____</p> <p>Date: _____</p> <p>Approved By: MPC Safety Supervisor: _____</p> <p>Date: _____</p>			

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11.0 APPENDIX C – PROCESS TO OBTAIN MPC APPROVED CASES PER DEVICE

11.1 Approved Cases/Devices

- 11.1.1 There are limited number of phone case styles that are available through the IT Now Service Portal.



These phone cases come with the Marathon “M” logo engraved on the back of the case and are pre-approved. By ordering through the IT Now Service Portal, it can save time in having your device in hand.

The following link will take you to the Category for ordering Mobile Phone Accessory Hardware:

[Catalog - Browse - MPC ITNow Portal \(service-now.com\)](https://service-now.com)

- 11.1.2 Additionally, the following devices and cases have been approved per REF-1056 Appendix B. Any deviation from this matrix must be approved by the Corporate Refining Safety and Security Manager.



Phone/Device	Rugged Case	Link to Order	Approved Color Insert proper color
iPhone 6 iPhone 7 iPhone 7 Plus iPhone 8 iPhone 8 Plus iPhone XR iPhone SE (2020)	LifeProof FRE	No longer available for purchase	Black Case with Lime Green Stripe or Black Case
iPhone 11	LifeProof FRE	No longer available for purchase	Black Case
iPhone 12	LifeProof/Otterbox FRE, Otterbox Defender	Order Internally	Black Case
iPhone 13	LifeProof/Otterbox FRE, Otterbox Defender	Order Internally	Black Case
iPhone 14	Otterbox FRE, Otterbox Defender	Order Internally	Black Case
iPad Mini Generation 5 & 6	Axtion Bold, Otterbox Defender & Defender Pro	<i>Company issued by Department</i>	Standard black
iPad Generation 5, 6, 7, 8, 9 & 10	Axtion Bold, Otterbox Defender & Defender Pro	<i>Company issued by Department</i>	Standard black
iPad Air Generation 4 & 5	Axtion Bold, Otterbox Defender & Defender Pro	<i>Company Issued by Department</i>	Standard black
SKF QuickCollect Sensor CMDT 391-K-SL	Device has built in heavy rubber casing	<i>Company issued by Department</i>	N/A

Note: This table may be updated to reflect the most recent approved devices as a simple administrative/clerical change at the approval of the Document Custodian of this policy.

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