

Comments on dISA-88.00.01

Ballot due 28 July 2010

Section: - Page: - Paragraph: - Line: -

Comment Classification:

<u> </u> mE = minor editorial	<u> </u> ME = major editorial
<u> </u> mT = minor technical	<u> X </u> MT = major technical

Old Wording:

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Specific Comment:

I have already submitted formal comments on this release of the standard, I will not proceed again as they were all democratically discussed and rejected. I just take the opportunity of this ballot to summarize my reasons for rejecting the new standard.

1. The main general concern is that ISA-88 and ISA-95 are largely overlapping and no progress have been made trying to decipher the respective positioning of these standards.
 2. The different models (Physical, Process, procedural control) are allowed to be collapsed and expanded, but more restrictions are introduced and there seem to be no right anymore to “rename” part of these models. Though there is a significant benefit of describing the concepts behind each level of the models, the mandatory use of the proposed names is an unacceptable constraint for leveraging this standard in the actual manufacturing diversity.
 3. (5.3.3): The straightforward matching of process and procedural control models directly conflicts with the ISA-88 part 3 that acknowledges the loosely coupled design between processing requirements (not equipment-aware general recipe) and actual facilities capabilities (equipment procedural elements) – a Process Operation can very well match simultaneously a Procedure or an Operation in different facilities. Part 3 even introduced the MRTC to realize the matching to align a given facility design to a given processing requirement.
 5. (4.4.3.4) There are still irrelevant constraints for equipment allocation: why a unit or an equipment module couldn't allocate control modules from outside the Process Cell? This is the obvious way to handle most transfers that ISA-88 persist not to take care of.
 4. (5.3.4.4) The Equipment module is still prevented to execute anything else than Phases – The rationale behind this constraint is still puzzling for me.
 6. (5.3.4.4) The identification of Recipe-Aware and Generic Equipment modules add complexity simply to please software vendors or system integrators that are unwilling to make their design more flexible.
 7. (7.6.1) The ISA-88 batch schedule is no less than a ISA-95 production schedule – this is a flagrant example on the many overlapping area of these standard that the committees is try to hide or does not want to acknowledge and treat accordingly
 8. (8) the control Activity Model 100% overlaps the ISA-95 part 3 actovity model. Everyone knows that and this section should have been totally dropped. This is another example of the above remark..
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Suggested Resolution:

No resolution is achievable within the current consensual mindset in the committee.

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Return your comments on or before 28 July 2010 to:

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