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The Honorable Stephen A. Feinberg
Dep. Secretary of Defense
1010 Defense Pentagon
Washington, DC 20301-1010

Subj: NDIA Integrated Program Management Div. Bean Counters Don't Know Shit from Shinola about Engineering (or Care)

Dear Hon. Dep. Secretary of Defense Feinberg:

The NDIA Integrated Program Management Division (IPMD) has submitted a draft EIA-748E Earned Value Management System (EVMS) to SAE International for adjudication and approval. The balloting process has begun. I am a member of the SAE G-47 Systems Engineering (SE) Committee (Committee) and have submitted comments on the draft.

This revision approval process is a sham. If the EIA-748E is approved, please ignore the results and certainly don't waste appropriated funds on any revisions to the DOD EVMS Implementation Guide or other DCMA compliance review documents to make them consistent with the revision.

The Committee's charter is:

The G-47 SE Committee serves as an industry focal point for SE by developing and maintaining standards, coalescing industry positions, preparing and coordinating positions on government policies & practices, and promoting sharing of best practices on the **engineering of systems**.

Yet, the draft EIA-748E includes the following:

Complementary systems or methodologies such as systems engineering, cost estimating, manufacturing/enterprise resource planning (M/ERP), and Agile software development often interface with the EVMS. These complimentary systems or methodologies deliver other functionality and value to the customer while earned value management provides a standardized method for measuring progress and contract reporting. The EVMS documentation should describe the system interfaces as well as the recurring control process to maintain data conformance and system compliance.

So, the draft describes SE as a "complementary system or methodology that "interfaces" with EVMS. The Committee of SEs is not qualified to comment on EIA-748E. The NDIA IPMD bean counters don't know shit from Shinola about best practices on the **engineering of systems** and don't care. Please ignore the results of the balloting and don't waste appropriated funds to assess or utilize the results of the balloting or to revise or continue compliance reviews.

So, why did the NDIA IPMD choose a SE organization for approval of a sham standard which is silent on engineering, the product scope, or capabilities? EVM is a program/project management (P/PM) tool and if any standard is selected by DoD for training of its SAEs and acquisition professionals, it should be an ANSI standard on P/PM.

Yours truly,



Paul J. Solomon

CC:

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