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September 10, 2025

The Honorable David Norquist
President & CEO
National Defense Industrial Association
2101 Wilson Blvd, Suite 700
Arlington, VA 22201

Subj: Proposed Statutory Requirement for Requirements Management Tools for Systems Engineering

Dear Hon. NDIA Pres. Norquist:

Per my letter, today, to Hon. USD(A&S) Michael Duffey, a proposed amendment to the Senate version of the NDAA for FY 2026, entitled REQUIREMENTS MANAGEMENT TOOLS IN DoD ACQUISITION PROGRAMS, requires requirements management tools for systems and software engineering programs. The tools utilize requirements management best practices including requirements traceability, automation, acceptance criteria, verification links, and best practices for agile and development.

There is nothing in the draft EIA-748E that will support the objectives of that amendment. To the contrary, EIA-748E states, "*Complementary* systems or methodologies such as systems engineering...and Agile software development often *interface* with the EVMS. These complementary 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." As you know, in my opinion, a contractor may be compliant with the EIA-748 guidelines but still manipulate the metrics to deliver negative management value to the customer.

Please request the NDIA Integrated Program Management Div. to cease and desist all approval/balloting effort unless it includes collaboration with the Systems Engineering Division to inject it with requirements management tools for systems and software engineering programs.

Additional information regarding requirements management best practices is in the revised white paper, Subj: Integrating the Embedded Software Path, Model-Based Systems Engineering, MOSA, and Digital Engineering with Program Management, September 10, 2025.

Yours truly,



Paul Solomon

CC:

Hon. Adam Smith, HASC
Hon. Mike Rogers, HASC
Hon. Roger Wicker, SASC
Hon. Dan Driscoll, Sec. of the Army
Hon. SON John Phelan

Hon. USD Michael Duffey
Hon. David Norquist NDIA
Hon. Troy Meink, Sec. of the Air Force
Russell Vought, Director, OMB
Dep. Sec. Defense Hon. Stephen Feinberg

Hon. Gen. B. Chance Saltzman, U.S. Space Force

Hon. Pete Hegseth, Sec. Def

Jon Sindreu, WSJ

Anthony Capaccio, Bloomberg News

Meg O’Keefe SAE G-47 SE Committee

John Evers SAE G-47 SE Committee