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September 17, 2025

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

Subj: NDIA Violates Its Mission Statement by Advocating SAE/EIA-748E Earned Value Management System, Part 2

Dear Hon. NDIA Pres. David Norquist:

This letter augments letter dated September 16. It cites the following documents:

1. Letter to Hon. USD (R&E) Emil Michael, Subj: *Shortcomings of Draft SAE/EIA-748E Earned Value Management System Standard, Part 5*, dated September 17, 2025.
2. White paper, Subj: *Integrating the Embedded Software Path, Model-Based Systems Engineering, MOSA, and Digital Engineering with Program Management*, dated September 16, 2025.

Excerpts from letter to USD Michael:

Note: This revision cites the guidebook, *Implementing a Modular Open Systems Approach (MOSA) in Department of Defense Programs*, February 2025. The guide provides best practices for planning, implementing, and evaluating MOSA. Best practices include using metrics that measure progress and achievement of MOSA objectives, implementation activities, and risk mitigations and using digital engineering (DE) practices necessary to capture, assess, and support MOSA elements.

The guidebook...provides *best practices* for planning, implementing, and evaluating MOSA. Best practices include using metrics that measure progress and achievement of MOSA objectives, implementation activities, and risk mitigations and using digital engineering (DE) practices necessary to capture, assess, and support MOSA elements. Excerpts are in Appendix R.

7. Adopt DE Practices:

- Use *DE practices* necessary to capture, assess, and support MOSA elements in product development to promote modularity and openness using data and models throughout the life cycle.

The draft SAE/EIA-748E is silent on the MOSA best practices or metrics in addition to its failure to address other engineering best practices such as DE and systems engineering.

As requested in the Part 1 letter to you:

The NDIA should:

1. Withdraw its submittal to the SAE International G-47 SE Committee and
2. Submit any draft EVMS standard, with best business practices for EVM, to an appropriate approving organization such as the Project Management Institute or ISO. Failure to do so would be a violation of NDIA's mission statement and would disqualify EIA-748 from being a Voluntary Consensus Standard (VCS) per OMB criteria.

Yours truly,

A handwritten signature in blue ink that reads "Paul J. Solomon". The signature is written in a cursive style with a long horizontal flourish at the end.

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

Hon. Pete Hegseth, Sec. Def

Jon Sindreu, WSJ

Meg O'Keefe SAE G-47 SE Committee

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

Anthony Capaccio, Bloomberg News

John Evers SAE G-47 SE Committee