

Paul Solomon
3307 Meadow Oak Drive
Westlake Village, CA 91361
Paul.solomon@pb-ev.com

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

Subj: Appeal of Ballot Results, SAE/EIA748E, Earned Value Management Systems

Dear Hon. NDIA Pres. David Norquist:

I have appealed the ballot results for SAE/EIA-748E Earned Value Management Systems on both technical and procedural grounds. A summary of the appeals follows:

Summary of Technical (Tech) and Procedural (Proc) Appeals to SAE/EIA748E Balloting	
Appeal #	Comment
Tech 1	Five Guidelines need tailoring to incorporate the product scope (technical baseline) and risk responses
Tech 2	The argument that the government overhauled FAR PART 34 is irrelevant and misleading.
Tech 3	My comment about false claim of “best business practices” per the PBBE Commission Report was ignored.
Tech 4	Committee’s reason to reject my specific comment ignored the evidence. Per Committee, "No specific inputs are provided to adjudicate concerns."
Proc 1	EIA748E is a proposed business standard that is outside of the scope and technology area of the G-47 Systems Engineering (SE) Committee.
Proc 2	Same as Technical Appeal 4
Proc 3	My technical comment was rejected for “lack of specific inputs to adjudicate concerns.” Table 3 of the referenced white paper included specific, recommended revisions that should have been adjudicated. Consequently, this complaint is procedural as well as technical. Note: See Letter dated Aug. 13, below.

Most of the technical issues regard EIA-748E’s silence on engineering and engineering best practices, including systems engineering (SE), digital engineering, and MOSA.

As recommended in previous letters to you, please assign members of the NDIA SE Division to assist the Integrated Program Management Division members in preparing responses to the technical appeals. The most pertinent of previous letters follow.

Letter to David L. Norquist, President & CEO, NDIA, Subj: Assign System Engineering Experts to Salvage Draft EIA-748E EVMS Standard, **dated 8/12/25.**

Letter to David L. Norquist, President & CEO, NDIA, Subj: Rejected Comments to Improve EIA-748E, **dated 8/13/25.**

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. 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