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

Subj: Assign System Engineering Experts to Salvage Draft EIA-748E EVMS Standard

Dear Hon. Pres. Norquist:

This is a follow-up to my letter to you, Subj: NDIA Input to Implementation Plan for Directing Modern Software Acquisition to Maximize Lethality dated March 9, 2025. In that letter, I recommended that you obtain input on the issue from both the NDIA Integrated Program Management Division (IPMD) and the System Engineering (SE) Division.

Today, the SAE G-47 SE Committee completed its first ballot on the draft EIA-748E Earned Value Management System (EVMS) Standard. The vote was 9 approved and 2 disapproved. I was one of the disapprovers. However, the IPMD must first respond to comments and revise the draft for a second ballot if EIA-748E is to be approved.

I recommend that you add someone from the SE Division to the IPMD team to develop the response and fix the deficiencies in EIA-748E. Otherwise, there is a high risk that EIA-748E will not get approved. The comments which require response primarily concern EIA-748E's absence of any guidance for:

1. The product scope, the technical baseline, technical performance, and quality.
2. Applying EVMS to model-based digital engineering environments.
3. Broadly accepted engineering practices or specifications for a material, product, process, procedure, or test method.

EIA-748E is not within the scope of SAE International's policies or of the Systems Management Council Organization and Operating Procedures. The scope of those documents follows:

Purposes and Ends Policy of SAE International:

Purposes: to advance the knowledge of the arts, sciences, **standards, and engineering practices** connected with the development, design, construction, and use of self-propelled machines, prime movers and related equipment (all herein collectively called "mechanisms");

Ends Policy: SAE International provides society and the global mobility engineering community with consensus-based standards to advance **quality**, safety and innovation.

Systems Management Council (SMC) Organization and Operating Procedures – Revised – November 2021

SMC Standard

These Technical Reports contain specific performance requirements and are used for: (1) design standards, (2) parts standards, (3) **minimum performance standards**, (4) **quality**, and (5) other areas conforming to **broadly accepted engineering practices or specifications** for a material, product, process, procedure, or test method.

Technical Competencies

The NDIA IPMD members lack the engineering technical competencies required to rehabilitate EIA-748E. That vacuum resulted in the following punt in the current, deficient draft EIA-748E. Its "Scope of EVMS" states: "Complementary systems or methodologies such as SE..., Agile software development often *interface with* the EVMS." NDIA needs a standard that integrates SE with EVMS, not interfaces.

For NDIA to transform EIA-748E so that it supports integrated program management, including integration with SE, experts from the NDIA SE Division should buttress the IPMD EVM experts. I have previously worked with Dr. Suzette Johnson and Gary Roedler. I recommend them or someone who also worked on *IEEE 15288 Meets Lean Agile*.

In my opinion, EIA-748E is destined for disapproval unless it is fixed to incorporate the SAE and SMC scopes above. EIA-748D is obsolete and should be cancelled. So please take corrective actions.

Yours truly,



Paul Solomon

CC:

Hon. Adam Smith, HASC

Hon. Mike Rogers, HASC

Hon. Roger Wicker, SASC

Hon. Troy Meink, Sec. of the Air Force

Hon. Dan Driscoll, Sec. of the Army

Hon. USD (A&S) Duffey

DOGE

Jon Sindreu, WSJ

Hon. USD Emil Michael

Hon. SON John Phelan

Anthony Capaccio, Bloomberg News