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The Honorable William LaPlante USD(A&S)
1010 Defense Pentagon
Washington, DC 20301-1010

Subj: More on DFARS Revision EVMS Case Fails to Meet Your Commitments to SASC

Dear USD LaPlante:

This letter augments the letter sent May 7, Subj: *DFARS Revision EVMS Case Fails to Meet Your Commitments to SASC*. There is another reason to scuttle that case and to abandon EIA-748 instead. The use of EIA-748 will obstruct the achievement of a digital engineering objective in DODI 5000.87, DODI 5000.88, and the DOD Digital Engineering Strategy.

That objective is to use automated tools to collect *metrics* of the performance, progress, speed, cybersecurity, and quality of software development. The cited plan to move towards automation precludes the use of the earned value technique, management assessment (percent complete). The reported percent complete of drawings or use cases is not an authoritative source of truth.

Per DODI 5000.88, the development of *software can be a major portion of the total system cost* and should be considered throughout the acquisition life-cycle. Management assessment of the “Budgeted Cost of *Work Performed*” provides a false, misleading metric that will mask true cost, schedule, and technical performance. It has no place in the digital engineering transformation. Nor do its derived metrics, CPI and SPI, have management value. So, the complete, software-intensive weapon system should be exempted from the DFAR EVMS requirement.

The attached, revised white paper, **Outcome-based Metrics Plus SE = Integrated Program Management, Rev. 3**, 5/10/2024, provides supporting rationale and references.

Thanks,



Paul J. Solomon

CC:

Hon. Robert J. Wittman, HASC Hon. Heidi Shyu, (USD(R&E))
Hon. Donald Norcross, HASC Hon. Andrew Hunter, AF Asst. Sec. for AT&L
Hon. Adam Smith, HASC Nickolas Guertin (ASN RD&A)
Hon. Elizabeth Warren, SASC Shelby Oakley, GAO
Hon. Susan Collins, Senate Defense Appropriations Subcommittee
Anthony Capaccio, Bloomberg News