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

Subj: NDIA Input to Implementation Plan for Directing Modern Software Acquisition to Maximize Lethality

Dear Hon. Pres. Norquist:

You were a recipient of my letter to OUSD(A&S) Morani, Subj; Implementation Plan for Directing Modern Software Acquisition to Maximize Lethality, dated March 8, 2025. The letter included a recommendation to terminate the DFARS Earned Value Management System (EVMS) clause. Please inform USD Morani of NDIA's position on my recommendation after obtaining input from the NDIA Integrated Program Management Division (IPMD) and the System Engineering (SE) Division.

The IPMD will hold a forum on March 25-27. IPMD is the author and steward of the *EIA-748 Standard for EVMS* so the forum provides a timely opportunity for it to develop its input to you.

The SE Div. should provide input because the NDIA SE white paper, *Moving from Predictive Planning to Empirical Planning for SE*, is a more appropriate Authoritative Source of Truth (ASoT) for acquiring software-intensive weapon systems than EIA-748. The SE white paper includes the following best practices:

- Establish a shared technical vision and solution intent
- Use right-sized planning that is refined over time through short learning cycles
- Perform product-based decomposition implemented through cross-functional teams
- Iteratively and incrementally build, verify, and validate the system
- Invest in the digital ecosystem as an enabler for agility and responsiveness

More importantly, the SE white paper focuses on the product and risk, not the statement of work (SOW). It covers topics such as "product roadmap...based on system decomposition, minimal viable product demonstrations (MVPs), capabilities, and risk prioritization." EIA-748 only discusses the SOW and the quantity of work performed. It is silent on the product, or technical baseline, and on risk. The following excerpt from the SE white paper is useful for effective software acquisition:

"With an incremental and iterative design approach, it becomes necessary to recast requirements into a set of outcome-based capabilities that incrementally deliver the solution. Demonstrating system capabilities in a gradually increasing fidelity environment from test to staging becomes the primary item of inspection during the incremental reviews. The benefit of this approach is that it delivers the validated system capability to the user sooner."

The SE white paper is consistent with the recommended practices, ASoTs and artifacts discussed in my white papers, *Integrating the Embedded Software Path*, *Model-Based Systems Engineering*, *MOSA*, and *Digital*

*Engineering with Program Management and Common Sense Project Management: "When you come to a fork in the road..."*

Finally, elimination of the DFARS EVMS clause will support an objective that you stated at the HASC hearing "as the Congress moves forward to reduce regulatory burdens and incentivize novel contracting approaches to attract and retain new companies, it is important to give traditional contractors access to the same streamlined system."

Elimination of EIA-748 will support statements and recommendations in the *NDIA VITAL SIGNS 2025 REPORT*, such as:

**Summary**

- Traditional Defense Industrial Base companies are weighed down with government policy, statutory, and regulatory requirements that both increase cost and stifle speed and innovation.
- Policymakers want to attract and retain small and non-traditional companies into the U.S. defense ecosystem, but they are struggling to reduce significant barriers to entry and retention, including increasing regulatory compliance costs.

**Recommendation**

DoD must...harmonize and streamline the layers of compliance requirements. This must start with an industry engagement to nominate compliance requirements to target. While a review of acquisition processes that do not require a change in statute can start quickly, the biggest regulatory changes will require Congress to act.

Please concur with my recommendation and endorse the implementation actions in my white papers. Enable DoD to Buy a Product that Works, not a SOW.

Yours truly,



Paul Solomon

CC:

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|------------------------------|----------------------------------|
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| Hon. Glen Grothman, HOAC     | Hon. Adam Smith, HASC            |
| Hon. Ken Calvert, HAC        | Hon. Mike Rogers, HASC           |
| Hon. Robert J. Wittman, HASC | Hon. Donald Norcross, HASC       |
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