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The Honorable Steven J. Morani
PTDO OUSD(A&S)
1010 Defense Pentagon
Washington, DC 20301-1010

Subj: Sharing My Insights and Recommendations with Industry

Dear PTDO OUSD(A&S) Morani:

Thank you for your letter and encouragement to share my insights and recommendations with relevant industry organizations. I am pleased that *Defense Acquisition Magazine* will publish a sequel to my 2022 article, "Better Program Management Through Digital Engineering," in August.

Although, I advocate rescission of the statute and regulation to comply with the EIA-748 Standard guidelines, I submitted recommended revisions to EIA-748 to the NDIA Integrated Program Management Division in 2012 and 2019. I am pleased that three of my recommendations to eliminate guidelines for cost accounting and overhead were accepted. However, the draft EIA-748E retains guidelines that are unnecessary for program management and remains silent on product scope (or technical baseline), rework, risk responses, product backlog, Minimum Viable Product, technical performance measures, requirements traceability, and technical debt.

The DoD EVMS Interpretation Guide recognizes the importance of technical performance. It states: "Government and industry program managers use EVM as a program management tool to provide joint situational awareness of program status and to assess the cost, schedule, *and technical performance* of programs for proactive course correction."

However, although the draft EIA-748E states "Complementary systems or methodologies such as systems engineering...often interface with the EVMS, its guidelines pertain to *work, not the system requirements or the product*. Per the draft, a principle of EVMS is "Integrate program work scope, schedule, and cost objectives into a performance measurement baseline plan against which (work) accomplishments are measured."

Buy a Product that Works, not a SOW.

Yours truly,



Paul Solomon

CC:

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