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September 21, 2025

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

Subj: Questions for NDIA Integrated Program Management Division Conference

Dear Hon. NDIA Pres. David Norquist:

During your address to the NDIA Integrated Program Management Div. Conference on Wednesday, please cover the draft SAE/EIA-748E EVMS standard. The draft was not approved during the first ballot.

Excerpts from the attached email to the SAE accrediting organization included comments that must be resolved for it to be approved. It also includes my recommendations to DOD policy makers and legislators, and questions to you, as follows:

I have also recommended to DoD policy leaders and legislators that DFARS be changed to remove the DFARS EVMS requirement and compliance reviews. The NDIA has not supported my recommendations.

NDIA Pres. Norquist and DOD officials will be speakers in La Jolla. Please ask them the following questions:

1. Why should TPMs be required only at major technical reviews, MVPs etc.?
2. Why does EIA-748 exclude the product scope or technical baseline? The argument that the WBS is "product oriented" only means that there is a structure or organizational framework for reporting purposes.
3. Why do we still need compliance reviews?
4. What is the business case for DOD to retain the DFARS EVMS clause?

Please answer the questions from your perspective.

Yours truly,



Paul Solomon

CC:

Hon. Adam Smith, HASC	Hon. USD Michael Duffey
Hon. Mike Rogers, HASC	Hon. David Norquist NDIA
Hon. Roger Wicker, SASC	Hon. Troy Meink, Sec. of the Air Force
Hon. Dan Driscoll, Sec. of the Army	Russell Vought, Director, OMB
Hon. SON John Phelan	Dep. Sec. Defense Hon. Stephen Feinberg
Hon. Gen. B. Chance Saltzman, U.S. Space Force	
Hon. Pete Hegseth, Sec. Def	
Jon Sindreu, WSJ	Anthony Capaccio, Bloomberg News
Meg O'Keefe SAE G-47 SE Committee	John Evers SAE G-47 SE Committee

Excerpts:

To the speakers and attendees at the NDIA IPMD Conference in La Jolla:

I have been advocating that EIA-748 needs to provide more management value since I was Northrop Grumman's representative on your Board. In 2012, four years after I retired, I first submitted recommendations during the 5-year revision cycle. The key recommendations were to:

1. Incorporate the product scope or technical baseline into the standard.
2. Remove the option to use technical performance measures (TPM) as interim measures of schedule progress instead of waiting for it to be in acceptance criteria at major technical reviews and in the criteria for Minimum Viable Product (MVP)s.
3. Use outcome-based measures instead of the quantity of work completed.

The Boards consistently submitted revisions or reaffirmations to the SAE for approval that omitted by recommendations and had no substantial improvements.

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Solomon's Unresolved Technical Comments, SAE/EIA-748E, Sept. 20		
Section	Comment	Resolution
Rationale	Per SMC 5.1.2, a standard should be used for quality and conform to broadly accepted engineering practices. The current draft EIA-748E includes three statements on business practices but none on engineering practices. Also, per SAESTandardWorks, "The G-47 Committee serves as an industry focal point for systems engineering (SE) by developing and maintaining standards, coalescing industry positions, preparing and coordinating positions on government policies & practices, and promoting sharing of best practices. The current guidelines in draft EIA-748E do not incorporate SE, refer to government policies on digital engineering, risk management, or iterative development.	Add: Updated guidelines incorporate or refer to government policies and modern, best practices on systems engineering, digital engineering, risk management, and iterative development.
Guidance	The EIA-748E guideline includes guidance to	Add: Revising the work

Guide line 1	The EIA-748E guideline includes guidance to complete the work but not the product. Best engineering practices include the product, also described as the technical baseline. For example, Per DoDI 5000.88 3.4 b., Technical Baseline Management: "The PM will implement and describe in the Systems Engineering Plan (SEP) a technical baseline management process as a mechanism to manage technical maturity, to include a mission, concept, functional, allocated, and product baseline. If practicable, the PM will establish and manage the technical baseline as a digital Authoritative Source of Truth (ASoT)." Per the IEEE Standard for Application of SE on Defense Programs: product baseline: • Describes the detailed design at a specific point in time, for production, fielding/deployment, and operations and support. • prescribes all necessary physical (form, fit, or function) characteristics and selected functional characteristics designated for production acceptance testing and production test requirements • is also known as the product configuration baseline.	Add: "Including the work necessary to produce the product scope of the program, including rework and risk responses."
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	Per DoDI 5000.88 3.4 b., Technical Baseline Management: The PM will implement and describe in the SEP a technical baseline management process as a mechanism to manage technical maturity, to include a mission, concept, functional, allocated, and product baseline. If practicable, the PM will establish and manage the <i>technical baseline</i> as a digital ASoT. The EIA-748E guideline is also silent on rework. Per the <i>GAO Cost Estimating Guide</i>, "programs ought to consider the allocation of risk into the baseline up front—especially when addressing the issue of rework and retesting. Experts have noted that to set up a realistic baseline, anticipated rework could be included as a separate work package. Using this approach, programs should include rework in the budget baseline because they acknowledge effort that is bound to involve revision, such as design." The EIA-748E guideline is also silent on risk management and risk responses. Per <i>DoD Best Practices for Using SE Standards (ISO/IEC/IEEE 15288, IEEE 15288.1, and IEEE 15288.2) on Contracts for DOD Acquisition Programs (15288BP)</i>, 6.4.9.4: Verification process outputs 2) Verify risks identified in the Risk Management process are mitigated to levels acceptable for continued development of the system as planned. Per the <i>GAO Schedule Assessment Guide</i>, GAO Schedule, Best Practice 1: Capturing All Activities, "Risk mitigation activities with scope and assigned resources should appear as discrete activities in the schedule."	
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Guide line 14	The term, “performance measurement criteria,” is ambiguous. “The guideline should specify “technical performance measurement” (TPM) criteria to be consistent with systems engineering (SE) best practices and a DoD SE guide, as follows: <i>Per DoD Best Practices for Using SE Standards (ISO/IEC/IEEE 15288, IEEE 15288.1, and IEEE 15288.2) on Contracts for DOD Acquisition Programs:</i> 6.3.7.4 Measurement process outputs c) Measurement data with the following attributes: 1) Provides data on established TPMs for use in project assessment and control to support the assessment of the system technical performance,	Guideline 14: Is: Using predefined performance measurement criteria, status the schedule and assess physical progress to determine budget earned. Should be: Using predefined performance measurement criteria, including technical performance measures, status the schedule and assess physical and
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	and for an assessment of risk in achieving the measures of effectiveness or measures of performance and associated operational requirements. NOTE—TPMs are a subset of measures that evaluate technical progress (i.e., product maturity) and support evidence-based decisions at key decision points such as technical reviews or milestone decisions. 2) Provides TPM data for use in project assessment and control to support the assessment of technical progress toward fulfilling system requirements. Per the DoD SE Plan Outline (SEP): SEP 3.2.2 TPMs Technical Assessment Process ... should include ... a set of TPMs covering a broad range of core categories, rationale for tracking, intermediate goals, and the plan to achieve them with as-of dates.	technical progress to determine budget earned.
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	Categories, rationale for tracking, intermediate goals, and the plan to achieve them with as-of dates.	
Common Terminology, STATEMENT OF WORK (SOW)	The program's product scope, which includes the product requirements should be differentiated from the work scope. Per the DoD SOW Handbook, the product scope is "the features and functions that characterize a product, service, or result." Per DoDI 5000.88, 3.4 b. Technical Baseline Management: The PM will implement and describe in the Systems Engineering Plan (SEP) a technical baseline management process as a mechanism to manage technical maturity, to include a mission, concept, functional, allocated, and product baseline. If practicable, the PM will establish and manage the technical baseline as a digital Authoritative Statement of Truth (ASOT).	Is: Document that communicates the program's work scope requirements and defines the technical requirements to the fullest extent possible. It is the basis for the work breakdown structure, establishing program schedules and budgets, assigning work to work teams, and assessing program risks or opportunities. Should be: Document that communicates the program's work scope that is needed to complete the product scope. It is the basis for the work breakdown structure, establishing program schedules and budgets, assigning work to work teams, and assessing program risks or opportunities.
Common Terminology, PRODUCT SCOPE	The program's product scope, which includes the product requirements, should be differentiated from the work scope. Per the DoD SOW Handbook, the	Add: "Product Scope: the features and functions that characterize a product,

	product scope is "the features and functions that characterize a product, service, or result." Per DoDI 5000.88, 3.4 b. Technical Baseline Management: The PM will implement and describe in the Systems Engineering Plan (SEP) a technical baseline management process as a mechanism to manage technical maturity, to include a mission, concept, functional, allocated, and product baseline. If practicable, the PM will establish and manage the technical baseline as a digital Authoritative Statement of Truth (ASOT). "Product Scope" is also defined in the <i>Project Management Institute Project Management Body of Knowledge</i>.	service, or result."
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