

Paul Solomon
3307 Meadow Oak Drive
Westlake Village, CA 91361
Paul.solomon@pb-ev.com

September 1, 2025

The Honorable USD (R&E) Emil Michael
Office of the Under Secretary of Defense, Research and Engineering (USD(R&E))
1010 Defense Pentagon
Washington, DC 20301-1010

Subj: SAE/EIA-748E Antithetical to DoDM 5000.100 TEST AND EVALUATION MASTER PLANS
AND TEST AND EVALUATION STRATEGIES

Dear Hon. USD (R&E) Emil Michael:

This letter augments the Part 2 letter, dated August 23, with excerpts from DoDM 5000.100 TEST AND EVALUATION MASTER PLANS AND TEST AND EVALUATION STRATEGIES (5000.100 T&E). Draft SAE/EIA-748E is antithetical to 5000.100 T&E because of:

1. Its statement that systems engineering is *complementary* to earned value management (EVM) and
2. Its guidance that technical performance goals “may” be used to measure progress does not support the following excerpts from 5000.100:
 - DoD systems acquired via the Defense Acquisition System, pursuing any adaptive acquisition framework pathway, in accordance with DoDD 5000.01 and DoDI 5000.02.
 - Measures, metrics, and methods to evaluate the operational effectiveness of the DoD system with scientific rigor in an operationally representative and relevant contested, congested, and constrained environment including operational users, DoD system defenders, and maintainers. These measures, metrics, and methods will be detailed in relevant guidance and will include, but are not limited to:
 - Relevant technical measures that enable and derive from operational requirements, concepts of operations, or as specified in other technical specifications supported by contractor test and evaluation (CT&E), developmental test and evaluation (DT&E), and live fire test and evaluation (LFT&E).

Per draft SAE/EIA-748E, “Earned value is a direct measurement of the quantity of work accomplished.” However, there are no widely accepted engineering best practices or business best practices that are correlated to or based solely on the quantity of work.

Recommendations

Please take the actions recommended on August 23. SAE/EIA-748E should remain disapproved. Obtain statutory authority. Don’t end up like the prisoners in Hotel California who,

“stab it (EIA-748) with their steely knives
But they just can't kill the beast”

Yours truly,



Paul Solomon

CC:

Hon. Adam Smith, HASC

Hon. Mike Rogers, HASC

Hon. Roger Wicker, SASC

Hon. Dan Driscoll, Sec. of the Army

Hon. SON John Phelan

Jon Sindreu, WSJ

Meg O’Keefe SAE G-47 SE Committee

Hon. USD Michael Duffey

Hon. David Norquist NDIA

Hon. Troy Meink, Sec. of the Air Force

Russell Vought, Director, OMB

Dep. Sec. Defense Hon. Stephen Feinberg,

Anthony Capaccio, Bloomberg News

John Evers SAE G-47 SE Committee