

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

September 4, 2025

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

Subj: SASC and DFARS Describe EVMS as a Business System, not Engineering or Manicuring

Dear Hon. Pres. Norquist:

This is a follow-up to my letter to you, Subj: NDIA Input to Implementation Plan for Directing Modern Software Acquisition to Maximize Lethality dated August 12, 2025 which stated that EIA-748E is not within the scope of SAE International's policies or of the Systems Management Council (SMC) Organization and Operating Procedures. The SAE SMC procedures for a standard include:

"These Technical Reports contain specific performance requirements and are used for: (1) design standards, (2) parts standards, (3) **minimum performance standards**, (4) **quality**, and (5) other areas conforming to **broadly accepted engineering practices or specifications** for a material, product, process, procedure, or test method."

EIA-748E is not within the scope of SMC procedures. It is a business procedure, not an engineering standard.

The Senate Armed Services Committee and DFARS also classify EVMS as a business system, not an engineering procedure. The Senate version of the NDAA for FY 2026, SEC. 823. EXEMPTIONS FOR NONTRADITIONAL DEFENSE CONTRACTOR, includes the following: "Nontraditional defense contractors, as defined by section 3014 of title 10, United States Code, shall not be subject to any of the following requirements: (2) DFARS 252.234-7002 (EVMS), or successor regulation."

Per DFARS 252.242-7005 Contractor Business Systems, "Contractor business systems" means—(2) Earned value management system, if this contract includes the clause at 252.234-7002, Earned Value Management System;" So, when the EVMS statute was written, it was the legislature's intent that EVMS is a business system, not a set of broadly accepted engineering practices.

I don't know what the scope of the like SAE/SMC procedure was when the NDIA and SAE first agreed to collaborate on a standard. However, the EIA-748E EVMS business system is clearly outside the scope and jurisdiction of the current SMC procedure. The SAE G-47 Systems Engineering (SE) Committee has no authority to approve EIA-748E just as it has no authority to approve the licensing requirements for a manicurist in California.

Please request the NDIA IPMD to cease and desist all approval/balloting effort unless it includes collaboration with the SE Division to inject it with modern engineering best practices such as digital engineering, iterative methods etc.

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