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May 19, 2025

The Honorable Stephen A. Feinberg
Dep. Secretary of Defense
1010 Defense Pentagon
Washington, DC 20301-1010

Subj: More on Ineffective Bullshit Reviews, a Barrier to Entry

Dear Hon. Dep. Secretary of Defense Feinberg:

Please change DOD policy and guidance for Integrated Baseline Reviews (IBR) to prevent more Ineffective Bullshit Reviews. A few changes will result in enduring cost savings and reduce the risks of Nunn-McCurdy breaches. This advice is especially important for new programs such as the F-47.

First, revise DoDI 5000.88 Engineering of Defense Systems. Add the IBR to the list of system level reviews. It already covers understanding of cost, schedule, and performance implications.

The current version follows:

3.5. PROGRAM TECHNICAL REVIEWS AND ASSESSMENTS.

a. Technical Reviews.

(1) Systems engineering technical reviews provide a venue to establish the technical baselines, assess the system's technical maturity, and review and assess technical risks. At each technical review, the PM will, to the extent practicable, use information from the digital authoritative source of truth to assess key risks, issues, opportunities, and mitigation plans in order to understand cost, schedule, and performance implications.

(2) Unless waived through the Systems Engineering Plan (SEP) approval process, the PM will conduct these system level reviews, or equivalent:

- (a) System requirements review or system functional review.
- (b) Preliminary design review (PDR).
- (c) CDR.
- (d) System verification review or functional configuration audit.
- (e) Production readiness review.
- (f) Physical configuration audit.

Second, revise *The Program Manager's Guide to the IBR Process (IBR Process)* to incorporate technical baseline management, as described in 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 technical baseline as a digital Authoritative Source of Truth."

The current *IBR Process* has two faults:

1. It cites the "technical scope of work" but does not define the term.
2. It cites the Performance Measurement Baseline (PMB) but does not define the term.

The recommended fixes follow:

1. Add a statement, "The PMB includes the technical, functional, allocated, and product baselines required by DoDI 5000.88 3.4 b. Technical Baseline Management.
2. In the section, IBR Objectives, change "technical scope of work" to "scope of work."
3. In the section, Expectations and Assumptions, add the technical baseline.
Is: Before executing the IBR, ensure the PMB reflects the entire scope of work, documented at the appropriate level of detail.
Should be: Before executing the IBR, ensure the PMB reflects the entire *technical baseline and* scope of work, documented at the appropriate level of detail.

IBR is not a Commercial Best Practice

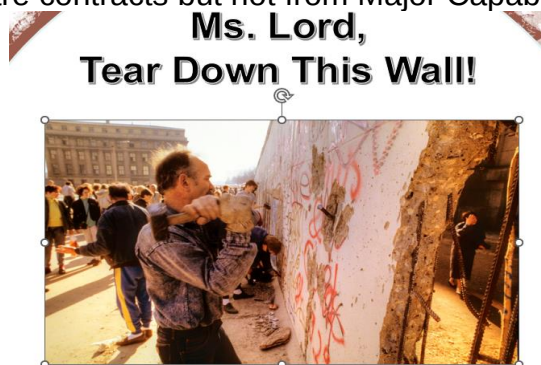
The IBR is not a commercial best practice and is a barrier to entry to non-traditional contractors. The *NDIA IBR Guide* is 34 pages long. Non-traditional defense contractors often hire costly EVMS consultants to prepare for the IBR. A typical excerpt from the Guide follows:

Examples of Supplier artifacts and short descriptions are as follows:

- Baseline Change Documentation. Baseline change documentation should be in accordance with the Supplier's internal processes. If there have been baseline changes since the IBR PMB was formalized, that documentation should be part of the artifact delivery.
- Budget Logs. All program budget logs related to the contract. For example, the Contract Budget Base (CBB) log, Undistributed Budget (UB) log, Management Reserve (MR) log, and Change Control Log should each identify any changes to budgets and current balances.
- Time-phased Control Account Plans (CAPs). A CAP is an artifact that depicts the time-phased, resource-loaded, work in each control account. The CAP defines the work packages and planning packages, the earned value technique (EVT) used to assess performance, POP dates for each work package, the specific resources assigned to each work package by element of cost (EOC), and the calendar spread of labor hours or direct cost in each work package.

Please look at the Acknowledgement Page of *IBR Process*. All the contributors are from DoD and other government organizations, EVMS consultants, and traditional contractors. Not one is from the commercial world.

The NDIA again fortified its barrier to entry by making no substantial changes to EIA-748. I used the following slide in a tutorial at the Naval Postgraduate School in 2020. Since then, the EVMS clause was removed for specified software contracts but not from Major Capability Acquisitions.



So, the IBR is still focused on the SOW, not the product.



Mr. Feinberg, it's your turn to tear down NDIA's wall. The IBR recommendation in this letter can be ignored if you and Congress simply eliminate the DFARS clause and statute. DoD is rebuilding its munitions. Traditional contractors, lobbyists, and NDIA are fortifying the EIA-748 wall. Sen. Wicker wants to Restore Freedom's Forge by lowering barriers to entry. Do you, Sen. Wicker, and DOGE have the cannon balls to defeat them?

Yours truly,

Paul J. Solomon

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Anthony Capaccio, Bloomberg News