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The Honorable Russell Vought
Director, Office of Management and Budget
725 17th St., NW
Washington, DC 20503

Subj: Recommendations to Request Cancellation of SAE/EIA-748 Earned Value Management System Standard

Dear OMB Director Vought:

This letter augments my letter to you on August 24, 2025, Subj: When you come to a fork in the road..." Part 2. Please request that SAE International cancel the EIA-748D Earned Value Management System (EVMS) Standard because the Office of Management and Budget (OMB) deems it to be "not fit for use." It does not meet the criteria of OMB Circular A-119 Federal Participation in the Development and Use of Voluntary Consensus Standards.

EIA-748 does not meet the OMB technical performance criteria in its *Capital Programming Guide* that:

1. A performance-based management system should be used to monitor contractor performance in achieving the cost, schedule, and performance goals during the contract period.
2. The Integrated product team must review the Work Breakdown Structure (WBS) to ensure that it will provide the basis to extend the Contract WBS to achieve integrated cost, schedule, and technical performance management.

Also, EIA-748 does not contain specific performance requirements that are required by SAE for a standard that is 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.

The absence of metrics is also cited in my letter to you dated September 17. It notes that the draft EIA-748E is silent on the MOSA best practices or metrics in addition to its failure to address other engineering best practices such as digital engineering and systems engineering.

This letter and referenced documents may be downloaded from www.pb-ev.com at the Acquisition Reform and White Paper tabs.

Yours truly,

A handwritten signature in blue ink that reads "Paul J. Solomon". The signature is written in a cursive style with a long horizontal line extending from the end.

Paul J. Solomon
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cc:
III