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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: Shortcomings of Draft SAE/EIA-748E Earned Value Management System Standard, Part 5

Dear Hon. USD (R&E) Michael:

This letter augments the Part 4 letter with excerpts from the revised white paper, *Integrating the Embedded Software Path, Model-Based Systems Engineering, MOSA, and Digital Engineering with Program Management*, dated September 16, 2025. The revised white paper incorporates your department's guidebook, *Implementing a Modular Open Systems Approach (MOSA) in Department of Defense Programs*, February 2025.

Excerpts from the white paper:

Note: This revision cites the guidebook, *Implementing a Modular Open Systems Approach (MOSA) in Department of Defense Programs*, February 2025. The guide provides best practices for planning, implementing, and evaluating MOSA. Best practices include using metrics that measure progress and achievement of MOSA objectives, implementation activities, and risk mitigations and using digital engineering (DE) practices necessary to capture, assess, and support MOSA elements.

The draft SAE/EIA-748E Earned Value Management System (EVMS) standard is silent on the MOSA best practices or metrics.

Information Needs of USD(T&E) Emil Michael

The guidebook...provides *best practices* for planning, implementing, and evaluating MOSA. Best practices include using metrics that measure progress and achievement of MOSA objectives, implementation activities, and risk mitigations and using digital engineering (DE) practices necessary to capture, assess, and support MOSA elements. Excerpts are in Appendix R.

7. Adopt DE Practices:

- Use *DE practices* necessary to capture, assess, and support MOSA elements in product development to promote modularity and openness using data and models throughout the life cycle.

The draft SAE/EIA-748E is silent on the MOSA best practices or metrics in addition to its failure to address other engineering best practices such as DE and systems engineering.

Yours truly,



Paul Solomon

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