

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

September 28, 2025

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

Subj: NDAA for FY 2026 MOSA Provision and Lack of Engineering Practices in SAE/EIA-748E EVMS

Dear Hon. NDIA Pres. David Norquist:

The Senate version of the NDAA for FY2026 includes Sec. 804 Modifications to Modular Open Systems Approach (MOSA). If passed, the Secretary of Defense shall ensure that every major defense acquisition program that uses a MOSA approach will submit a MOSA implementation plan with its acquisition strategy. That requirement will widen the chasm between the draft SAE/EIA-748E Earned Value Management System (EVMS) standard and the criterion for a SAE-accredited systems engineering (SE) standard.

The guidebook, *implementing a MOSA in Department of Defense Programs*, February 2025, 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. SAE/EIA-748E is silent on those best practices.

Current Policy

A DoD instruction and guide already specify the use of DE practices to link DE and MOSA, as follows:

1. DODI 5000.98 requires the use of DE practices to capture, assess, and support MOSA elements in product development and to document MOSA in the Acquisition Strategy.
2. The guidebook, *Implementing a MOSA in Department of Defense Programs*, 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 DE practices necessary to capture, assess, and support MOSA elements.

SAE/EIA-748E does not meet the SAE criterion for a SE standard that advances the state of technical and engineering sciences. As stated in the previous letter, SAE/EIA-748E is a proposed business standard that is outside of the scope and technology area of the G-47 SE Committee and does not meet the criterion set by the SAE Technical Standards Board Rules. As-is, it is not a Voluntary Consensus Standard that meets OMB criteria. To meet the SAE and OMB criteria, please take action to overhaul the draft.

Otherwise, please take action to remove obstructions to the successful implementation of the DE ecosystem and the MOSA approach and to eliminate compliance review costs. Initiate action with DoD or OMB to remove the statutory requirement for the DFARS EVMS clause.

Yours truly,



Paul Solomon

CC:

Hon. Adam Smith, HASC	Hon. USD Michael Duffey
Hon. Mike Rogers, HASC	Hon. David Norquist NDIA
Hon. Roger Wicker, SASC	Hon. Troy Meink, Sec. of the Air Force
Hon. Dan Driscoll, Sec. of the Army	Russell Vought, Director, OMB
Hon. SON John Phelan	Dep. Sec. Defense Hon. Stephen Feinberg
Hon. Gen. B. Chance Saltzman, U.S. Space Force	
Hon. Pete Hegseth, Sec. Def	
Jon Sindreu, WSJ	Anthony Capaccio, Bloomberg News
Meg O'Keefe SAE G-47 SE Committee	John Evers SAE G-47 SE Committee