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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 6

Dear Hon. USD (R&E) Michael:

The balloting to approve SAE Standard, SAE/EIA-748E Earned Value Management System (EVMS) was recently completed by the G-47 Systems Engineering (SE) Committee. That committee serves as an industry focal point for SE by developing and maintaining standards and promoting sharing of best practices on the engineering of systems.

I will submit a procedural appeal of the balloting process to approve SAE/EIA-748E to the SAE Systems Management Council. SAE/EIA-748E is not an engineering standard. It is a business standard that is outside of the scope and technology area of the G-47 Systems Engineering (SE) Committee. It is certainly not a best practice on the engineering of systems.

My appeal will be in accordance with the *SAE Systems Management Council (SMC) Organization and Operating Procedures*.

Supporting rationale and evidence for the procedural appeal are in the following table and attached letters.

Letters Documenting Reasons for Procedural Appeal of Ballot for SAE/EIA-748E		
To	Subject	Excerpts
Norquist	NDIA Violates Its Mission Statement by Advocating SAE/EIA-748E Earned Value Management System	SAE/EIA-748E is not within the scope of SAE International's policies or of the Systems Management Council Organization and Operating Procedures (SMC) because the SMC procedures specify that its standards 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-748 is a business standard, not a SE standard. EIA-748E contains no broadly accepted engineering best practices or SE best practices.
Michael		The guidebook, <i>Implementing a Modular Open Systems Approach (MOSA) in Department of Defense Programs</i>, 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.
Norquist	NDIA Violates Its Mission Statement by Advocating SAE/EIA-748E Earned Value Management System, Part 2	The NDIA should submit any draft EVMS standard, with best business practices for EVM, to an appropriate approving organization such as the Project Management Institute or ISO. Failure to do so would be a violation of NDIA's mission statement.
Norquist	NDAA for FY 2026 MOSA Provision and Lack of Engineering Practices in SAE/EIA-748E EVMS	The Senate version of the NDAA for FY2026 includes Sec. 804 Modifications to 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 EVMS standard and the criterion for a SAE-accredited systems engineering (SE) standard. 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.

Whether or not the SAE SMC agrees with my appeal, please support my recommendations to Undersecretary Feinberg in the attached letter, Subj: Major Reforms to Streamline Military Acquisitions, dated October 8, 2025.

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

Hon. Gen. B. Chance Saltzman, U.S. Space Force

Hon. Pete Hegseth, Sec. of War

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

Anthony Capaccio, Bloomberg News

John Evers SAE G-47 SE Committee