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December 26, 2025

Hon. Roger Wicker, SASC  
Hon. Adam Smith, HASC

Subject: NDAA for FY 2026 **Failed** to Meet Your Common Objectives

Dear Hon. Chairman Wicker and Ranking Member Smith:

My attached letter to you, Subj: NDAA for FY 2026 **Fails** to Meet Your Common Objectives, dated July 18, 2025, included comments regarding the Senate and House versions of the NDAA for FY 2026. That letter included my following sentiments:

1. "I am pleased that my recommendations to eliminate barriers to entry and to institutionalize digital engineering (DE) are in the current legislation."
2. EXEMPTIONS FOR NONTRADITIONAL DEFENSE CONTRACTORS, exempts nontraditional defense contractors from the Earned Value Management System (EVMS) requirement, DFARS Part 252.234-7002. However, because traditional contractors are not exempted, neither red tape nor compliance reviews have been cut, and Service Acquisition Executives (SAE) must still focus on the process instead of on mission outcomes of major capability acquisitions. Fix the NDAA for FY 2026, to preclude more Nunn-McCurdy breaches and bad outcomes for needed capabilities such as the F-47, ships, and subs.

I recommended that you "fix the NDAA during joint conference" but am disappointed that you did not.

#### **Shortcomings of the NDAA for FY 2026**

The NDAA that was signed did eliminate barriers to entry but failed to institutionalize DE or to eliminate the statute that requires the DFARS EVMS clause for traditional contractors.

#### **DE**

SEC. 221. REVIEW AND ALIGNMENT OF STANDARDS, GUIDANCE, AND POLICIES RELATING TO DE requires each Secretary of a military department to:

1. **review** reference architectures, standards, and best practices for the use of DE tools (including digital twins and digital threads) as in effect at the time of the review, including standards for the use of such tools at all stages of program design, development, and testing.
2. Identify best practices for DE within **each such** Armed Force.
3. Recommend improvements to the use of DE tools in **each such** Armed Force.

In my opinion, your objectives would be achieved more quickly and at less cost if a **common set** of reference architectures, standards, and best practices of the use of DE tools, as well as the DE tools themselves, be selected and institutionalized in DOD. Commonality would simplify the transfer of data between disparate weapon systems and military departments. It would enable skilled personnel to become quickly productive when transferred between programs or departments. The lack of redundancy would also reduce training costs, software license costs, and contractor costs.

I have worked on Air Force and Navy programs such as the B-21, F-18, F-35, Littoral Combat Ship, E-2 Hawkeye, Global Hawk, and MQ-8 Fire Scout. I have also worked with the IT community in India and S. Korea on project management. There are no fundamental differences in standards and best practices for engineering, systems engineering, or program management controls. Please amend Section 221 to require the recommended commonality.

#### **EVMS**

See previous letter.

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 AF

Russell Vought, Director, OMB

Hon. Dep. Sec. of War Stephen Feinberg

Hon. SON John Phelan

Hon. USD Emil Michael

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

Hon. Pete Hegseth, Sec. of War

Hon. Dan Driscoll, Sec. of the Army

Anthony Capaccio, Bloomberg News

Meg O'Keefe SAE G-47 SE Committee