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The Honorable USD (R&E) Emil Michael
Office of the Under Secretary of War, Research and Engineering (USW(R&E))
1010 Defense Pentagon
Washington, DC 20301-1010

Subj: Pending SAE/EIA-748 Earned Value Management Systems Standard is Unfit for Use

Dear Hon. USD (R&E) Emil Michael:

This is an update to my letter, Subj: Leveraging Engineering and Digital Engineering (DE) Practices with Outcome-based Metrics, dated November 1, 2025. It includes recent justification to declare that the pending revision to SAE/EIA-748 Earned Value Management Systems Standard (EIA-748E) is unfit for use as a voluntary consensus standard (VCS), as explained in the white paper, Common Sense Project Management: “When you come to a fork in the road...”.

EIA-748E remains silent on risk responses and rework, technical performance measures (TPM), and product scope. The NDIA and SAE have maintained the status quo by disapproving my comments to add those topics and terms in Guideline 1, Guideline 14, and Terminology.

Their specious reasoning for disapprovals is in the document, *Council 28-Day Ballot, G-47 Systems Engineering Committee, Updated responses to Paul Solomon’s “final” inputs*, dated 12/8/2025 (Ballot).

My Comments and SAE Responses in Ballot

Guideline 1: Risk responses and rework.

My comment:

Add, “Including the work necessary to produce the **product scope** of the program, including **rework** and **risk responses**.”

SAE response:

As to **rework**, note that the GAO statement indicates “ought to consider” not “shall consider” so this is not required. On **risks**, where a program has already identified risks and appropriate resolution approaches as part of their overall development approach, these would be included in the program plan and therefore the WBS. Programs address these “unknowns” (potential for rework and risks not yet identified) through various approaches, including risk management and reserves, as already described in several places of EIA-748E in Section 3.5. These approaches, while relevant to the extent addressed in EIA-748E, are **outside the scope of EIA-748E**. The proposed resolution does not add to the existing guideline and instead emphasizes two aspects of “Define the authorized work elements for the program” that are addressed on Section 3.5 along with other aspects.

Disapproved.

Guideline 14: TPMs

My comment:

Guideline 14 Is: Using predefined performance measurement criteria, status the schedule and assess physical progress to determine budget earned.

Should be: Using predefined performance measurement criteria, ***including TPMs***, status the schedule and assess physical and technical progress to determine budget earned.

SAE response:

(“The term …”): Guideline 10 describes the need to establish “objective performance measurement criteria for each work package”; TPMs are not applicable to every single work package that would be in a project work breakdown system. TPMs can be useful in ***augmenting*** EVM, as part of a Balanced Scorecard and a balanced approach to monitoring overall program status. In addition, the ***terminology of TPMs is not universally used outside of DoD-related programs***, so the more general phrasing of “performance measurement criteria” is more appropriate for this standard. **Disapproved**.

Terminology: Product scope.

My comment:

Differentiate the "product scope" from the "work scope." See comment for "statement of work."

Suggested Resolution

Add the term, "Product Scope": (the features and functions that characterize a product, service, or result). Product Scope" is defined as above in the DoD SOW Handbook and in the *PMI Project Management Body of Knowledge*.

The program's product scope, which includes the product requirements should be differentiated from the work scope. Per the DoD SOW Handbook, the product scope is "the features and functions that characterize a product, service, or result." Per DoDI 5000.88, 3.4 b. Technical Baseline Management: The PM will implement and describe in the Systems Engineering Plan (SEP) a technical baseline management process as a mechanism to manage technical maturity, to include a mission, concept, functional, allocated, and product baseline. If practicable, the PM will establish and manage the technical baseline as a digital Authoritative Statement of Truth (ASoT).

SAE response:

The proposed resolution does not add anything to the existing statement that isn't already comprehended. Note that EIA-748E may be used by a range of program types, not just for the Engineering of Defense Systems and thus EIA-748E should not have its scope narrowed or at least interpreted to be narrowed by this resolution. As an aside, note that DoDI 5000.88 when referring to the SEP references the SEP generated by the (typically) PEO / PMO, not program plans or SE plans generated by the contractor(s). **Disapproved**.

(“The program's ***product scope*** …”): Adding terminology unique to Product Scope, as with other responses, ***could be misinterpreted by readers*** of the proposed updated standard and the proposed addition (***features and functions that characterize a product***) does not add any additional clarity. ***Work Scope*** is the broader terminology and already ***comprehends*** program effort, ***including products***, services, or other results. **Disapproved**.

Unfit and Untrustworthy

EIA-748E is unfit for use as a VCS. It does not support the Secretary of War's Acquisition Transformation Strategy directions to remove unnecessary process and regulations, to leverage existing authoritative data sources, including contractor data and automated reporting mechanisms to assess program performance. EIA-748E EVM data is not trustworthy and may be manipulated. Please join with Dep. Sec. of War Feinberg to take the actions in my letter to Feinberg, Subj: Prioritized Menu of Acquisition Reform Actions, dated October 28, 2025.

Yours truly,



Paul Solomon

CC:

Hon. Adam Smith, HASC
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Hon. Roger Wicker, SASC
Russell Vought, Director, OMB
Hon. SecNav John Phelan
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