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May 26, 2026

The Honorable Mike Rogers  
Chairman, HASC  
2216 Rayburn House Office Building  
Washington, D.C. 20515

Subject: Proposed Markup for NDAA for FY 2027, Part 2

Dear Hon. Chairman Rogers:

This letter augments my letter to you, Subj: Proposed Markup for NDAA for FY 2027, dated February 5, 2026. Please markup FY 2027, Section 805, RISK-BASED APPROACH TO MONITORING CONTRACTOR BUSINESS SYSTEMS.

The current markup requires the Secretary to ensure that requirements for the surveillance of contractor business systems do not exceed the minimum requirements that are necessary to conform with commercial best practices or industry standards, as applicable, for that type of system.

My letter to then-Chairman Smith, Subj: Request for Defense Acquisition Reform and GAO Investigation, dated December 19, 2019, regarded GAO to determine if the Earned Value Management System (EVMS) standard, EIA-748, meets the OMB criteria to be a Voluntary Consensus Standard (VCS). I assert that EIA-748 is ineffective, impractical, and obsolete. Justification was provided from a letter to Ms. Margaret Weichert, then OMB Dep. Dir. for Management, Subj: Improve Training for Program and Project Management and New Voluntary Consensus Standard for EVM, dated December 4, 2019.

Additional evidence that EIA-748 is ineffective, impractical, and obsolete is provided in my white paper, *DOD Acquisition Reform: EVMS-lite and Integrated Program Management*, rev.19, 10/10/25.

### **Requested Markup**

Please authorize the GAO or the selected acquisition research organization described in section 4142(a) of title 10, United States Code to confirm or deny that EIA-748 is ineffective, impractical, and obsolete. Please do one or both of the following:

1. Markup Section 805 to require the Secretary of Defense to enter into an agreement with the acquisition research organization described in section 4142(a) of title 10, United States Code, requiring the organization to document and evaluate EIA-748 and determine whether it meets the criteria to be a VCS.
2. Authorize the GAO to perform a like assessment.

After the assessment, don't just stop EVM surveillance. Rescind the EVM statute.

Yours truly,



Paul Solomon

CC:

Hon. Dep. Sec. Stephen Feinberg	Hon. Adam Smith, HASC
Hon. Adam Smith, HASC	Shelby Oakley, GAO
Hon. David Norquist NDIA	
Hon. Roger Wicker, SASC	Hon. Troy Meink, Sec. of the AF
Hon. Russell Vought, Director, OMB	Hon. Hung Cao, Acting Sec. of the Navy
Hon. Gen. Saltzman, U.S. Space Force	Hon. Pete Hegseth, Sec. of War
Hon. Dan Driscoll, Sec. of the Army	Hon. DoW CIO Kirsten Davies
Anthony Capaccio, Bloomberg News	Hon. USW(R&E) Emil Michael
Michael Cadenazzi, Asst. Sec. of War for Industrial Base Policy	