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The Honorable Stephen A. Feinberg
Dep. Secretary of Defense
1010 Defense Pentagon
Washington, DC 20301-1010

Subj: Recommendation to Foster One Strong Industrial Base

Dear Hon. Dep. Secretary of Defense Feinberg:

This letter augments my letter, Subj: *Your Memo, Reforming the Joint Requirements Process to Accelerate Fielding of Warfighting Capabilities*, dated September 3, 2025. The recommendations therein are applicable to your directive in the memo, Subj: *Fostering One Strong Industrial Base*, dated September 14, 2026, to publish clear, specific, and publicly available commercial-aligned criteria for contractor Earned Value Management Systems (EVMS) and issuance of a class deviation, grounded in the Department's statutory reliance authorities, accepting a registered independent public accounting firm's certification against those criteria in place of Department review.

Please specify that the commercially-aligned criteria for EVMS be based on and consistent with the Project Management Institute's (PMI) standards and guides. Excerpts from the previous letter follow.

...reforms should abandon the NDIA's EVMS standard, SAE/EIA-748, and replace it with PMI standards and guides. The GAO provided justification to utilize PMI documents. GAO Report is cited in my white paper, Subj: DOD Acquisition Reform: EVMS-lite and Integrated Program Management.

GAO report, GAO-20-44 *Improving Program Management*, provides compelling information to justify a change to OMB and DoD policy regarding EIA-748. The report cites PMI documents, which include *PMBOK® Guide-Seventh Edition*, as:

- Widely accepted standards for Integrated Program Management (IPM)
- Utilized worldwide
- Generally recognized as leading practices for IPM
- Approved by the American National Standards Institute.

Please coordinate with OMB Dir. Vought and within DoD to implement my recommendations.

Additional justification is in my article in *Defense Acquisition Magazine*, title, "A Contract Requirement Rule for Program Managers," November 2015.

Yours truly,



Paul J. Solomon

CC:

Hon. Adam Smith, HASC
Hon. Roger Wicker, SASC
Hon. SecAF Meink
Hon. Russell Vought, Director, OMB
Hon. Acting SECNAV Cao
Hon. Gen. Saltzman, U.S. Space Force
Hon. Mike Rogers HASC
Hon. Ken Calvert, HAC
Anthony Capaccio, Bloomberg News
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