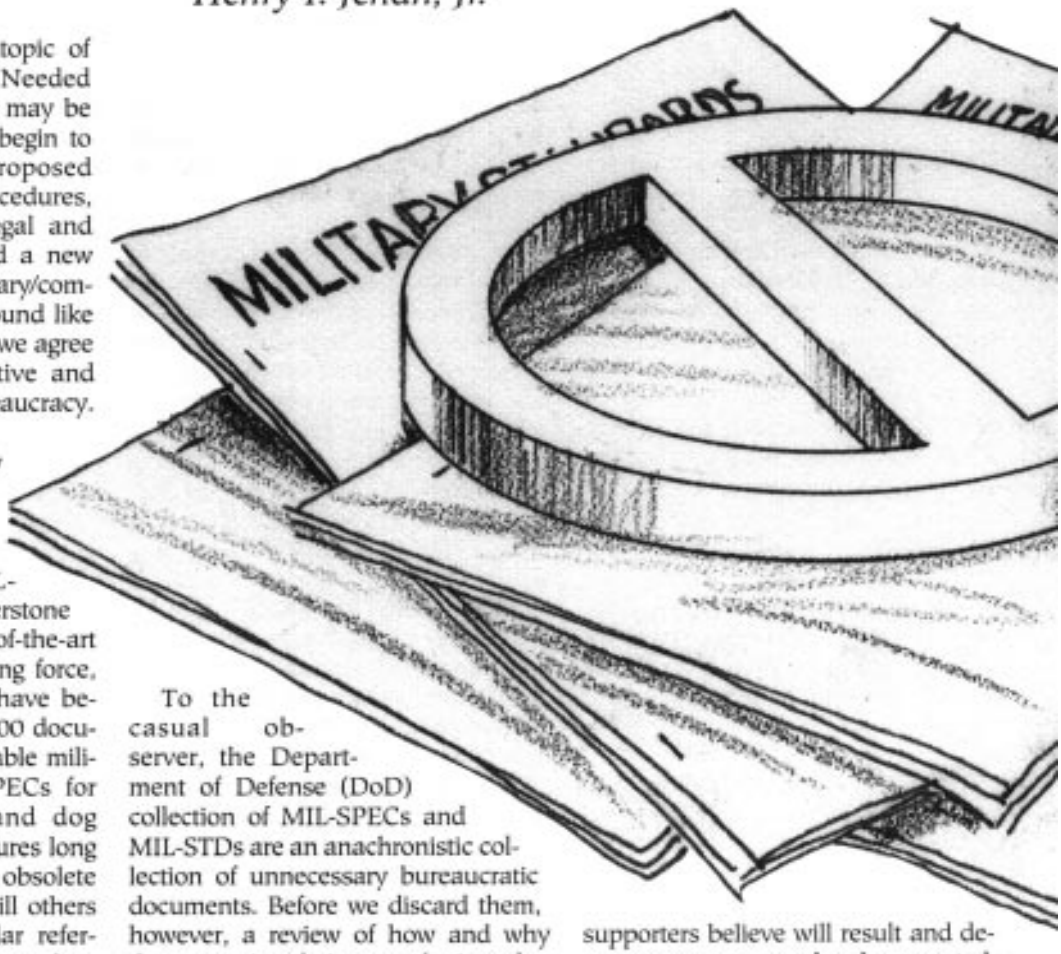
MIL-SPECS AND MIL-STDS NO MORE?

DoD Changes Prioritizing Policy

Henry I. Jehan, Jr.



Acquisition reform is the topic of many conversations. Needed and long overdue, this may be the year in which we begin to see improvements. The proposed streamlined contracting procedures, elimination of restrictive legal and regulatory requirements, and a new focus on an integrated military/commercial industrial base all sound like positive changes to a system we agree is an overburdened, restrictive and often counterproductive bureaucracy.

One effort frequently championed by reformers is elimination of military specifications (MIL-SPECs) and military standards (MIL-STDs). Once a critical cornerstone in fielding an effective state-of-the-art logistically supportable fighting force, MIL-SPECs and MIL-STDs have become a system of some 35,000 documents. Many have questionable military need, such as MIL-SPECs for chocolate chip cookies and dog combs. Others define procedures long ago determined technically obsolete by the commercial sector. Still others define cascading and circular references from one document to another, often ending at the starting point.

To the casual observer, the Department of Defense (DoD) collection of MIL-SPECs and MIL-STDs are an anachronistic collection of unnecessary bureaucratic documents. Before we discard them, however, a review of how and why they came into being may be in order.

These documents evolved to what they are because of bonafide requirements. Yet, the dialogue I have heard on acquisition reform has not included discussion of what will be lost if MIL-SPECs and MIL-STDs are eliminated. Rather, the discussion seems to center on a perceived cost savings that supporters believe will result and detractors say cannot be documented.

Cost Controversy

The cost controversy related to MIL-SPECs and MIL-STDs is based on reasonable estimates that they add as much as 30 or 40 percent to DoD acquisition costs. Presumably, by eliminating the MIL-SPECs and MIL-STDs, this cost will be a real dollar

---

Mr. Jehan is the Deputy Project Manager for Instrumentation, Targets and Threat Simulators at the Army Simulation, Training and Instrumentation Command (STRICOM), Orlando, Fla. He is a PMC 94-1 graduate.

savings in a time of declining budgets. However, this argument fails to explain why specifications and standards exist. Not created for economic reasons, they exist because, as history has shown, they were required to reduce combat risk. Simply put, they represent dollars paid now to save lives later.

Some may contend that cost is not the only reason for eliminating MIL-SPECs and MIL-STDs. To many, bureaucracy issues, document deficiencies, and burden on industry are adequate justifications to advocate total elimination of the documents in favor of using commercial standards. However, history has shown us that this may be the worse possible course of action.

The roots of the current system of specifications and standards lie in the supply fiascos of the Spanish-American War, and a need for good standard procedures for packaging and preserving supplies and material. From the problems experienced in the field and at sea, the MIL-SPECs and MIL-STDs system was born. Subsequently, industry adopted many of the specifications and standards, institutionalizing them into what have become the commercial procedures standards and specifications of today.

However, these adaptations of use by the commercial sector are developed to meet civilian needs, not the rigors of combat. During conflict, failures of commercial and improperly designed military materiel are not counted in monetary costs; they are bought with mission failures and loss of human life. Historically, this price has been more than our forefathers were willing to bear. Have our values changed so we can now afford such human cost? Based on recent experiences in Desert Storm, I would say not.

While eliminating them may produce short-term savings, history has shown that the long-term cost of not having MIL-SPECs and MIL-STDs is a price our nation has not been willing to accept.

Reversing Priorities

Department of Defense leadership does not advocate total elimination of military standards and specifications. A policy memorandum of 29 June 1994, by Dr. William J. Perry, Secretary of Defense, states:

> Performance specifications shall be used when purchasing new systems, major modifications, upgrades to current systems, and nondevelopmental and commercial items, for programs in any acquisition category. If it is not practicable to use a performance specification, a non-government standard shall be used. Since there will be cases when military specifications are needed to define an exact design solution because there is no acceptable non-governmental standard or because the use of a performance specification or non-government standard is not cost effective, the use of military specifications and standards is authorized as a last resort, with an appropriate waiver.
>
> Waivers for the use of military specifications and standards must be approved by the Milestone Decision Authority (as defined in Part 2 of DoD Instruction 5000.2). In the case of acquisition category I D programs, waivers may be granted by the Component Acquisition Executive, or a designee. The Director, Naval Nuclear Propulsion shall determine the specifications and standards to be used for naval nuclear propulsion plants in accordance with Pub. L. 98-525 (42 U.S.C. § 7158 note).

In her comments at the April 26, 1994, Defense Acquisition Reform Symposium, Mrs. Colleen A. Preston, Deputy Under Secretary of Defense (Acquisition Reform), stated that the intent of DoD policy is to reverse the priority by which military and commercial standards and specifications are incorporated in procurement actions. Use of commercial practices, standards and specifications is prioritized ahead of military standards and specifications,

but use of MIL-SPECs and MIL-STDs is not eliminated completely.

It is incumbent on personnel in the Office of the Secretary of Defense, military services and defense agencies responsible for implementing this change in policy to ensure that implementation reduces bureaucracy across all aspects of our acquisition system, for both contractor and government. Decisions on which industry standards, commercial specifications, MIL-SPECs and MIL-STDs should be imposed on a program are critical factors in balancing the tradeoffs between cost, schedule and performance with direct battlefield consequences. Because they represent technical decisions, these factors are best evaluated by a knowledgeable program team and should be a decision reserved for the program manager (PM) with the approval of the Milestone Decision Authority.

Identifying when MIL-SPECs and MIL-STDs should be used instead of commercial practices, standards and specifications is only part of the specifications and standards problem that must be addressed in each procurement. In most discussions on eliminating MIL-SPECs and MIL-STDs, most examples come from the electronics industry. This industry has an almost daily change in technology and a reasonably solid set of industry specifications and standards. It contends that MIL-SPECs and MIL-STDs are obsolete, references obsolete practices and, to correct problems in existing contracts, would require an inordinate number of engineering change proposals at an unaffordable cost. Another common argument has been incorporation of a MIL-SPEC in a contract forces the contractor to give us less for more, because the commercial sector often has cheaper products that exceed the MIL-SPEC. Undoubtedly, Dr. Perry's direction gets to the core of these arguments. However, this new direction may not correct the perceived problems with the standards and specifications.

Historically, we have done a poor job of understanding and tailoring the MIL-SPECs and MIL-STDs incorporated into our contracts.

A bigger issue is how we as acquisition managers employ the standards and specifications.

Many MIL-SPEC and MIL-STD problems could have been corrected if a few changes had been made in how we incorporated them into our contracts. Typically, we included them by reference without a thorough understanding of their content. We incorporated them by default, frequently not making provision to change to updated versions during contract performance. And, we made them absolute standards, which not only established minimum requirements but often limited performance as well.

A New Way of Doing Business

The new policies regarding specifications and standards add an unprecedented level of importance to the PM's responsibility to understand the implications of the specifications and standards applicable to the contract. The MIL-SPECs and MIL-STDs represent a historical compilation of lessons learned, while commercial specifications, standards and procedures are not tailored to military requirements. As a result, the PM must understand the lessons learned captured in the MIL-SPECs and MIL-STDs; the implications of the commercial specifications, standards and procedures; and how these often incompatible worlds interface in the system being acquired.

Historically, we have done a poor job of understanding and tailoring the MIL-SPECs and MIL-STDs incorporated into our contracts. Now that the use of MIL-SPECs and MIL-STDs is the exception rather than the rule, we must give them the attention they deserved all along. If we must use MIL-SPECs or MIL-STDs, we must review and understand their content and intent to ensure they are appropriate and justified before we incorporate them into the contract. Additionally, if the MIL-SPEC or MIL-STD is technically obsolete, it should be updated or eliminated. To ensure this, the program office discovering the inadequacy must become responsible for initiating action to have the technically knowledgeable and responsible government organization make the needed corrections.

Summary

Military specifications and standards play a vital role in our acquisition process. While eliminating them may produce short-term savings, history has shown that the long-term cost of not having MIL-SPECs and MIL-STDs is a price our nation has not been willing to accept.

The change in DoD policy to reprioritize the use of commercial standards, procedures and specifications ahead of military standards and specifications is wise. However, those responsible for implementing this policy must ensure the PM is given maximum flexibility to trade off the type of specifications and standards used to optimize the program. In doing this, the PM must not lose sight of the long-term combat implications of the standards and specifications used, while pursuing innovative ways to reduce any unnecessary burden imposed on the contractor.