08 Feb 2020

U.S. Citizenship and Immigration Services

USCIS California Service Center

Attn: I-129 H-1B Regular Cap,24000 Avila Road

2nd Floor, Room 2312

Laguna Niguel, CA 92677

Re:         **CONFIDENTIAL TREATMENT REQUESTED UNDER FOIA**

H-1B Petition

Petitioner: Infosys Limited

Infosys Limited H-1B Employee and Beneficiary: Senthilprabhu Balakrishnan

Dear Officer:

My name is Rajsree Santhanam and Infosys Limited directly employs me in the position of Delivery Manager in its ECSADME Unit. I am responsible for overseeing all project deliverables under Infosys Limited’s contract with its client, Underwriters Laboratories

As Delivery Manager, my role entails identifying business opportunities and guiding proposals; reviewing all project delivery processes within the Unit; and participating in Unit-level and organizational initiatives at the highest level of project delivery within Infosys Limited’s guidelines and policies, and in accordance with contractual requirements. I write this letter to confirm that Infosys Limited directly employs and controls the work activities of Mr . Senthilprabhu Balakrishnan in the professional position of Technology Analyst - US

Infosys Limited Relationship With Underwriters Laboratories

Infosys Limited’s only relationship with Underwriters Laboratories is a contractual one that began in <<YEAR >>. Throughout Infosys Limited’s history with Underwriters Laboratories ,Infosys Limited has executed <<HUNDREDS? THOUSANDS? PLS BE FACTUALLY ACCURATE; **THE MORE DETAIL, THE BETTER**>> of projects. At any one time, Infosys Limited is simultaneously executing <<TENS? HUNDREDS? PLS BE FACTUALLY ACCURATE; **THE MORE DETAIL, THE BETTER**>> projects comprising up to <<TENS? HUNDREDS? PLS BE FACTUALLY ACCURATE; **THE MORE DETAIL, THE BETTER**>> Infosys Limited employees in the U.S. and more outside of the U.S. Underwriters Laboratories and Infosys Limited anticipate a need for Infosys Limited services comprising about <<NUMBER>> Infosys Limited employees for a <<NUMBER>>-year period.

The MSA is implemented through project engagement documents – such as SOWs (Statements of Work) – that define specific initiatives, including work requirements, performance and design requirements, and scope. Generally, Infosys Limited and Underwriters Laboratories begin discussing renewal/ update of an SOW several weeks in advance of expiration. Until a project’s outcome or deliverable is completed, SOWs are renewed/ updated as a matter of course.

Infosys Limited’s Right of Control

As the sole and direct employer, Infosys Limited has exclusive and direct personnel authority over all employees, including Mr. Senthilprabhu Balakrishnan regardless of work location. Such personnel authority includes, but is not limited to <<PLEASE REVISE TO REFLECT SCOPE OF SUPERVISION; PLEASE ADD AS NEEDED; **THE MORE DETAIL, THE BETTER**>>:

* Define and control every term and condition of employment, including hire, deploy, promotion, compensation, benefits, vacation and other time off, and termination;
* Assign work tasks and work location(s);
* Control work activities regardless of work location;
* Evaluate work product;
* Develop and execute career planning and development; and
* Control mandatory time recoding and expense submissions and regular performance achievement assessments for employees.

Underwriters Laboratories has no personnel authority or right-of-control over Infosys Limited employees, including those deployed to a client work location.

Infosys Limited Supervision

An Infosys Limited manager directly controls and supervises Mr .Senthilprabhu Balakrishnan and his work activities. Specifically, Bhavik Ravindra Jani , whom Infosys Limited directly employs as Senior Project Manager, is Mr . Senthilprabhu Balakrishnan ’s direct supervisor. This supervisor is physically located at the ***same*** worksite as Mr . Senthilprabhu Balakrishnan to facilitate Infosys Limited’s direct control.

Infosys Limited supervision may take several forms, including, but is not limited to <<PLEASE REVISE TO REFLECT METHODS OF SUPERVISION; **THE MORE DETAIL, THE BETTER**>>:

* Provide day-to-day guidance, feedback, and evaluation of work performance and products to ensure adherence with varying project requirements;
* Monitor employee contributions towards project and module progress in accordance with contract and other variable requirements; set milestones to accomplish project deliverables;
* Provide ongoing constructive and timely feedback towards performance expectations and project requirements; engage in a formal annual appraisal cycle; and
* Deploy varying communication methods to achieve effective supervision, including, but not limited to in-person meetings; audio, video, and other calls; reports and interaction through Infosys Limited systems and platforms.

H-1B Itinerary

Infosys Limited will be deploying Mr . Senthilprabhu Balakrishnan to support its project at an Infosys Limited client location at Underwriters Laboratories at 333 Pfingsten Rd, 60062 which is located within the intended area of employment of the LCA supporting this Infosys Limited petition.

H-1B Position

Infosys Limited’s H-1B petition includes a detailed job description, which directly corresponds to Mr . Senthilprabhu Balakrishnan ’s H-1B specialty occupation position of Infosys Limited Technology Analyst - US .I reviewed that job description in detail and validated through my signature on that description that it directly corresponds to Mr . Senthilprabhu Balakrishnan ’s role.

Under this SOW, Underwriters Laboratories has engaged Infosys Limited to deliver <<DESCRIBE EXAMPLES, TYPES, OR A RANGE OF PRODUCTS THAT THE CUSTONER EXPECTS UNDER THE SOW UNDER AN AGILE ENGAGEMENT; THE DELIVERABLE ***CANNOT*** BE DESCRIBED AS “STAFF AUG”; **THE MORE DETAIL, THE BETTER**>>:

* <<DELIVERABLE EXAMPLE 1>>.
* <<DELIVERABLE EXAMPLE 2>>.
* <<DELIVERABLE EXAMPLE 3>>.

Mr . Senthilprabhu Balakrishnan ’s role in the project team is to contribute to Infosys Limited’s deliverables by <<DESCRIBE EMPLOYEE’S CONTRIBUTION TO DELIVERABLE(S)>>.

Underwriters Laboratories has limited visibility into the work activities of Infosys Limited employees. As the sole employer in fact with primary and direct right-of-control, it’s Infosys Limited – not Underwriters Laboratories - that can provide a detailed description of Infosys Limited’s employees’ work activities.

Infosys Limited’s minimum requirement for entry into its position of Technology Analyst - US is a directly relevant U.S. 4-year degree (or its equivalent) in Computer, Data, Information, or Network Technology or Science, or in Software or Electronic Engineering from an accredited college or university, plus directly relevant professional work experience in the field. Infosys Limited normally requires such a degree as a minimum qualification for entry into this particular position. Further, the nature of the specific duties of an Infosys Limited Technology Analyst - US are sufficiently specialized and complex, so that the knowledge required to perform the duties is usually associated with the attainment of such a degree. Mr . Senthilprabhu Balakrishnan qualifies for the Infosys Limited Technology Analyst - US, because he holds a qualifying degree or its equivalent, plus directly relevant professional work experience in the field.

Conclusion

In light of the above, I respectfully request USCIS approval of Infosys Limited’s H-1B petition on Mr . Senthilprabhu Balakrishnan ’s behalf. My statements in this letter are true and accurate to the best of my knowledge and belief. Thank you.

Sincerely,

<<SIGNATURE>>

Rajsree Santhanam

Delivery Manager

Infosys Limited

Email: Rajsree\_S@infosys.com

<<HERE’S A SIGNATURE LINE ***IF*** A CLIENT COUNTERPART IS WILLING TO SIGN – ***NOT*** REQUIRED; OPTIONAL>>

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| --- |
| Acknowledgement Signature  Name: <<NAME>>  Title: <<TITLE>>  Underwriters Laboratories  Dated: 08 Feb 2020 |