

August 25, 2021

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services

RE: H-1B Petition on behalf of **Kuldeep Tyagi**

Dear Officer:

My name is **Sivasakthivelrajan Pothiraj** and I serve as Senior Technical Manager at HCL America, Inc. ("HCL"). I am writing this letter to confirm that pursuant to the H-1B petition filed on behalf of **Kuldeep Tyagi** (hereinafter, "the Beneficiary"), HCL requires the services of the Beneficiary in the role of System Analyst on the Chief Finance Office (CFO) project for our client, USAA (United Services Automobile Association), at their worksite located at 9800 Fredericksburg Road, San Antonio, TX 78288.

The business relationship between HCL and USAA has been ongoing more than 18 years whereby HCL provides application development, maintenance, enhancement, and support services for various technology projects. HCL now requires the Beneficiary's services so that he may work in specialty occupation of System Analyst on a project at USAA's worksite in San Antonio, TX.

I. Assignment Duration

09/01/2021 – 08/31/2024

II. Project Description

Name of Project: Chief Finance Office (CFO).

Scope, nature and purpose of project:

The United Services Automobile Association (USAA) is a Texas-based Fortune 500 diversified financial services group of companies offering financial products and services to past and present members of the Armed Forces and their immediate families in the United States. The company offers banking products and services comprising checking and savings accounts, certificates of deposit, credit cards, home mortgages, home equity products, auto loans, auto insurance, home and property insurance, life insurance, annuities, and other insurance solutions.

Chief Finance Office (CFO) is the project based on z/OS where huge data for bank and insurance is store and through continuous integration and continuous development automation is needed on z/OS system using the latest IBM technologies. Technologies used for automation on z/OS system CICS, COBOL IDz and Java.

III. Position Description

The Beneficiary will be responsible on the specific assignments and according to the targets and timelines in the project plan, he will perform the following duties

- Gather new requirements for different modules in Chief Finance Office (CFO) project, drawing out a plan for releases of the enhancements for the application requested by the users and planning work for subsequent releases.
- Test, maintain, and monitor computer programs and systems.
- Creating Test design docs for new enhancements Chief Finance Office (CFO) and Hotfixes for the existing system
- Defining Developer and Test Methodology to carry out the development schedule
- RDC Tool Enhancement to fit Office 365 data model which could be used to test the Data warehouse mart effectively with a limited Data set.
- Analysis of COBOL programs and deployment testing before releasing to stakeholders.
- Bug fixing of any error occurs during the USAA Process and production release.
- Preparing and analyzing the weekly performance report of the product for different global markets and sharing the same with the business management team.
- Interacting with onsite and offshore team in resolving their problems
- Using the move-up process to ensure work is reflected in production systems
- Consult with management to ensure agreement on system principles.
- Resolving deployment issues and coordination with Operations for deploying services in production.

Beneficiary's Specific Job Duties- The percentage of time to perform the duties

Sl. No	Activity	Percentage of time spent
1	To analyze define and design technical solution for Chief Finance Office (CFO) product's enhancement and work towards continuous improvement during product implementation and production support stages	40%
2	To coordinate with technical teams for pending system designs for new requirements	20%
3	Addressing System and Business Critical issues and fixing for Business continuity	15%
4	To train others and prepare and deliver presentations for knowledge sharing amongst different teams in the project	15%
5	Implementing HCLT's Propriety Process and Tools	10%

IV. Itinerary of Services

In the specialty occupation, the Beneficiary will responsible for understanding and participating in the project Design, Analysis and development initiatives as well as maintenance efforts by HCL America, Inc.

- Business Analysis and Requirement Gathering for Chief Finance Office (CFO) Project.
- Software Solutioning and Prototyping on Mainframe systems
- Software Testing and Implementations, system malfunctions to restore normal functioning
- Process Engineering and Competitive Analysis
- Implementation and improvement of business processes for Chief Finance Office (CFO) Project
- Experience in managing onsite and offshore product development engagements.

Based on the specific assignments and according to the targets and timelines in the project plan, the Beneficiary will perform the following duties:

Period of Service (mm/dd/yy to mm/dd/yy)	Service Engagement Details	Percent age of Time	Project/ Location
09/01/2021 To 05/25/2022	<p>Beneficiary is engaged in delivering the following services:</p> <p>Requirements Gathering, Analysis and Design documents for Chief Finance Office (CFO) Project.</p> <ul style="list-style-type: none"> • Understanding Requirements for Chief Finance Office (CFO) project as System Analyst and create Functional and design Documents. • To analyze define and design technical solution for Chief Finance Office (CFO) product's enhancement and work towards continuous improvement during product implementation and production support stages • Creating Technical design Documents and Test Plans. • Design and test Mainframe jobs. <p>Beneficiary will be using technologies and tools such as:</p> <p><u>Languages</u>: COBOL, CICS, JCL, PL1, SQL, Assembler, IDz</p> <p><u>Database</u>: DB2, Oracle 10i</p> <p><u>GUI</u>: HTML,CICS</p> <p><u>Tools</u>: Endeavor, Alchemist, Quality Control, QTP, Remedy, Rally, abend-aid, Eclipse,Junit, IBM UCD,</p>	40%	USAA CFO System Analyst 9800 Fredericksburg Rd, San Antonio, Texas – 78288, USA

	zOS Connect and CI/CD pipeline. O/S : Windows 7, Z/OS		
05/26/2021 To 11/29/2022	To coordinate with technical teams for pending system designs for new requirements <ul style="list-style-type: none"> Team meeting and coordination with all stack holder for system design and analysis. Inputs of Analysis to be given in Functional Specification. RestAPI testing for suggested enhancements. Bug fixing of any error occurs during System testing, User Acceptance Testing and in production. Deployment of mainframe components using IBM UCD. 	20%	USAA CFO System Analyst 9800 Fredericksburg Rd, San Antonio, Texas – 78288, USA
11/30/2022 To 04/10/2023	Addressing System and Business Critical issues and fixing for Business continuity <ul style="list-style-type: none"> Interacting with onsite and offshore team in resolving their problems Preparing and sending out the weekly status report to the client and HCL managers Coding the required changes after performing the impact analysis and keeping in mind the actual need of the business user. Consult with management to ensure agreement on system principles. 	15%	USAA CFO System Analyst 9800 Fredericksburg Rd, San Antonio, Texas – 78288, USA
04/11/2023 To 11/16/2023	To train others and prepare and deliver presentations for knowledge sharing amongst different teams in the project Job duties involves, performing: -	15%	USAA CFO System Analyst 9800 Fredericksburg Rd, San Antonio, Texas – 78288, USA

	<ul style="list-style-type: none"> • Train for Process Engineering for improving deployment & maintenance of application through continuous integration & deployment pipelines using CI/CD Pipeline. • Competitive Analysis of the product to further improve marketability & business productivity. • Implementation and improvement of business processes. • Monitoring timeliness and quality of deliverables, • Performance Tuning processes. 		
11/17/2023 To 08/31/2024	Implementing HCLT's Propriety Process and Tools Job duties involves, implementing: - <ul style="list-style-type: none"> • PM Smart (Project Life Cycle Management Tool) for proper management of product post deployment. • Use HCLT Risk Identification Tool to monitor & fix application security vulnerability. • Use DATAGen - Random Data Generation Tool to support BVT for creation of business intelligence analysis & further tooling. 	10%	USAA CFO System Analyst 9800 Fredericksburg Rd, San Antonio, Texas – 78288, USA

Please note: The above-mentioned services and dates are based on the current project status and are provided by the end client. However, these dates of engagements for each type of service will be re-evaluated from time to time on a regular basis and will be extended based on the progress of the project.

V. Position Requirements

Education:

Companies seeking to employ a **System Analyst** require prospective candidates to have a strong foundation in the field of Computer Science or a related field which can only be obtained through the completion of a Bachelor's degree or progressively responsible experience that is equivalent to the attainment of at least a Bachelor's degree. The skills, knowledge, and analytical thinking acquired through the acquisition of a Bachelor's degree or its equivalent is considered necessary by experts in the industry and thus the degree is considered an industry standard requirement for the position. HCL, like other information technology services and software development companies, does not and will not employ individuals in the offered position unless they meet this minimum standard. These minimum academic requirements are consistent with the requirements for comparable positions in the industry, and they clearly mark this position as a specialty occupation.

Practical application of skills:

This position has the dual responsibility of understanding and participating in the project design/development initiatives with Mainframe with programming knowledge of CICS, COBOL and DB2 as well as maintenance efforts by HCL America, Inc. The position requires a person with a background in Business Analysis and Requirement Gathering implementation of Software Solutioning and Prototyping with testing the Software with existing system using the Process Engineering and Competitive Analysis for Implementation and improvement of business processes and expertise in managing onsite and offshore product development engagements.

VI. Evidence pertaining to the Beneficiary's Qualification and Skills:

The Beneficiary is well qualified for the offered professional position based on the academic credentials and prior related experience gained before joining our company in the U.S. As outlined above, the offered position clearly qualifies a specialty occupation role requiring at least a Bachelor's degree in a specific field of study, and the Beneficiary has gained the educational background and experience that we require for this position.

More specifically, the Beneficiary was awarded a Master's Degree in Computer Applications from Maharshi Dayanand University, Rohtak in 2006. He has deep understanding of Capital Market, Risk & Compliance domain along with extensive solution development experience.

Apart from this education the beneficiary has also completed NIIT Program of advance computing and languages of CICS and COBOL.

Beneficiary, have been employed with HCL since 2st December 2013. He has a deep understanding of solutions and services that can be aligned for a client's business needs, and the challenges associated with HCL specific onsite and offshore engagements with its clients.

In addition to the Beneficiary's academic credentials, the Beneficiary possesses professional experience relevant to the proffered specialty occupation. Beneficiary's has 14 years of extensive experience in design, development, and administration of Mainframe Z/OS and IMS DB/DC applications. Beneficiary's has extensive working knowledge of architecture concepts such as Service Oriented Architecture (SOA) and Information Management as well as technologies. His in-depth knowledge and understanding of software technologies, provides him with the ability to design solutions based on clients stated as well as unstated requirements while minimizing the developmental challenges. Accordingly, the Beneficiary is an ideal candidate for the specialty occupation position and has gained competency in computer science principals, including:

- In-depth understanding and execution experience of Software Engineering Principles,

Architecture, Software Development Life cycle

- Having an overall experience of 14 year in z/OS operations as a System Analyst in System Analysis & Design, Coding, Testing and production support of Software Applications on IBM Mainframes. Able to handle incidents/defects as per process using Agile methodology.
- Expertise in Operating System / Tools & Technology / Languages, etc.
 - z/OS - Operating system, Windows Server
 - Languages -: COBOL, CICS, JCL, PL1, SQL, CL400, Assembler
 - Databases - DB2, VSAM, Oracle 9i, SQL, IMS
 - Business Areas - Banking, Healthcare, Insurance, Card Domain, Telecomm and Supply Chain.
 - Tools - Endeavor, File aid, Alchemist, Quality Control, QTP, Remedy, Rally, abend-aid, Eclipse, Junit, Github, Selenium, CI/CD pipeline, UCD, IBM DBB, Kafka.

The Beneficiary possesses an understanding of solutions and services that can be aligned to a client's business needs, and the challenges associated with HCL-specific engagements with its clients. With this knowledge the Beneficiary is able to analyse customer requirements and execute technical tasks in engagements.

VII. HCL normally requires a degree or its equivalent for the position:

It is a normal practice for our organization to hire individuals in the same or similar position who hold at least a Bachelor's degree or its equivalent in a related field. HCL has a history of this practice, and continues to hire candidates holding at minimum a Bachelor degree in a field related to the offered position.

To ensure that candidates are capable of performing the day-to-day job duties defined by HCL pursuant to the engagement, HCL requires at least a Bachelor's degree in a related quantitatively analytical field. Typically, HCL requires as per its internal hiring policies that any person who is hired for this position has at least a Bachelor's degree or its equivalent in a related field.

The System Analyst is a professional position that requires at least a Bachelor's degree or its equivalent in the fields of Computer Science, Engineering, Management Information Systems, Information Technology, or a related, quantitatively analytical field.

VIII. Why the position would be considered a Specialty Occupation (i.e. one that requires a Bachelor's degree):

The offered position requires specialized and complex knowledge of both business and information technology: general business skills in marketing, marketing research, negotiations, budgeting,

accounting, operations, customer relations, management, business law and contracts, advertising, communications, data analysis and statistics-along with comprehensive technical IT and information systems skills such as requirement gathering, system development methodology, understanding of networking and database management, testing, documentation and system evaluation. These skills are best acquired in Bachelor's degree in Business Administration, Management Information Systems or related field, or the foreign equivalent. The specific technical skills and the general business skills acquired in a Bachelor's degree and gained over from experience, in one of the above listed fields would provide the beneficiary with the necessary skills to be successful Developed at HCL. These skills could only be obtained through a minimum of a bachelor's degree in the above-mentioned field. It is highly unlikely that such a position would be offered to someone without this level of specialized knowledge and experience.

This position require the dual responsibility of understanding and participating in the project design/development initiatives with Mainframe with programming knowledge of CICS, COBOL and DB2 as well as maintenance efforts by HCL America, Inc. The position requires a person with a background in Business Analysis and Requirement Gathering implementation of Software Solutioning and Prototyping with testing the Software with existing system using the Process Engineering and Competitive Analysis for Implementation and improvement of business processes and expertise in managing onsite and offshore product development engagements.

These skills are best acquired through completion of a Bachelor's degree in Computer Science or a related field. The specific technical skills and the general business skills acquired through completion of a Bachelor's degree in one of the above listed fields would provide the Beneficiary with the necessary skills to be successful in the offered positions. These skills could only be obtained through a minimum of a Bachelor's degree in the above mentioned fields. It is highly unlikely that such a position would be offered to someone without this level of education and experience.

HCL's minimum requirement for the offered position is a standard baseline requirement common to the industry in parallel positions among similar organizations. Firms similar to HCL routinely recruit and employ only degreed individuals in the specific specialty. This requirement is necessary to ensure smooth running of the operations of the engagement leading to project deliveries and client satisfaction Therefore, the offered position is specialty occupation requiring an in-depth knowledge of computer science.

IX. Employment control and supervision by the Petitioner:

While onsite, the Beneficiary will work for 40 hours each week under the exclusive control of Sivasakthivelrajan Pothiraj, whose phone number is 917 650 9393. Sivasakthivelrajan Pothiraj is a HCL employee who is stationed in US worksite and is charged with ensuring that the HCL professionals such as the properly execute their responsibilities.

Although the Beneficiary will be working at USAA's worksite, HCL will exercise ultimate supervision and control of the Beneficiary's employment. The USAA will not have the authority to contract out the Beneficiary's services or assign him to a different employer. Specifically, the Beneficiary will be controlled by Sivasakthivelrajan Pothiraj, Senior Technical Manager at HCL, and HCL will be

HCL AMERICA, INC.

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responsible for all the terms and conditions of the Beneficiary's work including hiring, supervision, compensation, termination and will otherwise control the Beneficiary's day-to-day work.

Please note that HCL is NOT a staffing company. HCL is fully responsible for selecting and vetting candidates to work on the engagement to achieve the goals outlined in the Statement of Work. HCL, and not the end client, determine the minimum criteria for selection. In order to maintain its reputation and ensure that candidates are capable of performing the day-to-day job duties defined by HCL pursuant to the engagement, HCL requires at least a Bachelor's degree in a related quantitatively analytical field.

Please feel free to contact me if you have any further questions regarding the Beneficiary's employment.

Sincerely,

P.Sivasakthivelrajan

Sivasakthivelrajan Pothiraj (Onsite Manager)

Designation: Senior Technical Manager

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HCL