October 14, 2021

**VIA FEDERAL EXPRESS**

U.S. Citizenship and Immigration Services

California Service Center

**RE: Response to Request for Evidence (RFE)**

**Petitioner: VMware, Inc.**

**Beneficiary:** **Narasimha Rao NELLURI Receipt #:** **WAC-21-350-50654**

**Due Date:** **December 23, 2021 (+60 days)**

Dear Sir or Madam:

We timely submit this letter and additional documentation in response to the September 27, 2021 Request for Evidence (RFE) issued by U.S. Citizenship and Immigration Services (USCIS) in connection with our H-1B petition filed on behalf of the beneficiary, Mr. Narasimha Rao Nelluri. As requested, we provide further details and information to establish that the beneficiary is qualified for the proffered position of Senior Member of Technical Staff.

We trust that this response, along with additional supporting documentation, clarifies the beneficiary’s eligibility for the H-1B visa category.

**More Information of the Proffered Specialty Occupation Position**

We seek to employ the beneficiary in the proffered position of Senior Member of Technical Staff, aligned to the OOH occupation of Software Developers, Systems Software (15-1133.00).[[1]](#footnote-1)

Specifically, the beneficiary’s professional services are required in the proffered specialty occupation position of Senior Member of Technical Staff with VMware Inc. (“VMware”). In this specialty occupation, the beneficiary will leverage his expertise in computer information systems while operating VMware’s Agile system environment to drive end-to-end solution testing and automation initiatives. The beneficiary will develop and improve VMware's overall test strategies, as well as the quality of the team’s deliverables. Especially, he will provide his demonstrated technical expertise with functional testing of L2/L3 networking protocols and technologies, including routing, VPN (IPsec), IPv6, QoS, Firewall, MPLS, and NAT. In doing so, Mr. Nelluri will coordinate closely with cross-functional VMware teams including engineers, programmers, analysts and others to interface between hardware and software, develop specifications and performance requirements, and resolve customer problems. He will customize software solutions to optimize operational efficiency in Cloud-based environments and exercise discretion within defined practices and procedures in selecting methods and techniques for obtaining solutions; utilize specialized knowledge of database management system software, development environment software, object-oriented development software, program testing software, system engineering principles, and various programming languages. Furthermore, Mr. Nelluri will utilize his demonstrated expertise with computer hardware and software, including applications and programming, systems architecture and components, and computer organizations. In doing so, Mr. Nelluri will apply his knowledge of engineering principles, best practices, and technologies to the design, development, testing, and production of various VMware products and services.

More specifically, in the proffered position of Senior Member of Technical Staff the beneficiary’s time will be allocated in performance of the following specialized duties:

|  |  |  |
| --- | --- | --- |
| **Qualifying Job Duty** | **Specialized Technologies or Processes Involved** | **% of Time Spent** |
| Analyze and evaluate software functional specifications and their related features to develop a calibrated test strategy plan covering all of the required areas across the feature set.  Define the scope of each solution feature and formulate customized functional and system test plans focused on feature verification, internal software and hardware table verification, functional specifications, and customer focused testing.  Create detailed test plans, testing system changes and enhancements to ensure VMware solutions’ completeness and accuracy.  Coordinate with the Test Manager and other Test Analysts to plan and execute testing activities from inception to completion.  Interact with VMware’s sales team and customer teams to review incoming technical questions, handle ad-hoc requests, and run demonstrations for root cause analysis, fix verification, and bug or limitation documentation.  Guide and assist the TAC team with escalation reproduction efforts as deemed necessary, and partner closely with VMware developers to ensure that project requirements and related requests for changes are understood and remain within the defined performance standards. | Switching: VLANs (802.1Q, VTP), DHCP, multicast, L2/L3, aggregation techniques, spanning tree (PVST+), and LACP.  Routing: IP Routing, HSRP, VRRP, OSPF, BGP, MPLS, VRF, EIGRP, route policies, and VxLAN.  QoS.  Cisco tools and internal processes required to create and implement test plans. | 20% |
| Configure and implement hardware, features, traffic generators, and other tools to emulate the required system environment on the basis of finalized project requirements and methodologies.  Validate the existing functional cases across the technology on networking products.  Review and execute exhaustive test plans with a focus on potential weaker areas, performance metrics, and realistic scales.  Perform calibrated regression testing as necessary based on the nature of the underlying system, feature change, and enhancement.  Develop complex test strategies to ensure maximum test coverage of VMware products to minimize post release customer defects, thereby ensuring high quality deliverables. | Cisco Nexus N9500/N9300 Hardware like N9K-C9316D-GX, N9K-C9336C-FX2, and Cisco operating system, NX-OS.  Various test traffic generator tools like Ixia, IxNetwork Spirent, Scapy, Iperf, and others.  Networking protocols involved in layer 2 and layer 3 technologies, such as IP forwarding, IP multicast, OSPF, BGP, VXLAN, MPLS, eVPN, ECMP, VRRP, STP, RSTP, MST, PVST+, Ethernet link aggregation, LACP, VLAN, HSRP, VPC, BGP/EVPN, VxLAN, ERP, QinQ, etc.  Alcatel Omini switch Hardware like OS9900,OS10K, OS6850, and Aclatel operating system (AOS). | 40% |
| Maintain and expand the existing automation test framework, writing and implementing automation scripts in Python.  Develop automated test frameworks in VMware’s networking domain.  Automate functional and scale test cases, and drive timely resolution of customer found defects using Python.  Automate complex testing scenarios and use cases to reduce manual test execution and triaging time for improved engineering efficiency.  Drive automation efforts and build an automation platform that will enable team to write automation tests quickly and efficiently.  Operate independently as well as with other cross-functional teams to drive end-to-end automation of complex test cases.  Design and script quality test codes to execute and automate complex solution platforms and systems to scale test cases across multiple releases. | Python, Bash and TCL programming languages.  Cisco hlite and PyATS framework, and Trex Traffic Generator tool.  Alcatel Qualisystem’s and MATI (TCL) framework  Linux tools such as ping, traceroute, tcpdump, ifconfig, ip link, ip route, arp, /proc/net, /proc/sys/net, vmstat, netstat etc.  Cisco NX-API, Rest API,  IxNetwork RestPy, JSON.  Version Control: GIT | 40% |

**The Beneficiary’s Qualifications for the Proffered Specialty Occupation Position**

USCIS requests additional information to establish by a preponderance of evidence that Mr. Nelluri possesses the requisite baccalaureate level of education in a specific specialty related to the occupation, or that he qualifies based on a combination of education, specialized training, and/or progressively responsible experience, and that he has recognition of such expertise. In this regard, we respectfully provide that the beneficiary qualifies for the position of Senior Member of Technical Staff with VMware based on his directly relevant academic background and work experiences in the field of computer information systems equivalent to a Bachelor of Science degree in Computer Information Systems, which directly qualifies him for the proffered position with VMware.

More specifically, as established by the enclosed documentary evidence in the form of an expert opinion evaluation letter, degree certificates, transcripts, and employment experience confirmation letters, Mr. Nelluri’s education and experience have equipped him with a background in Computer Information Systems. Specifically, while completing his Bachelor of Technology degree in Electrical and Electronics Engineering at Kakatiya University in India, Mr. Nelluri completed such relevant coursework as Engineering Mechanics, Computer Programming, Instrumentation, Systems Engineering, among others. The substantive nature of Mr. Nelluri’s completed academic coursework translates directly into the specialty occupation nature of the offered position, involving business system requirements gathering, software and hardware platform performance optimization, solution specifications development, system optimization management, system functionality development, data analysis for test scripts and process automation, data loading, application programming, and project scoping operations, among other specialized functions described in detail above.

In addition to his directly relevant academic background, Mr. Nelluri has acquired **over twelve (12)** years of experience involving directly related responsibilities with computer information systems, requirements gathering and analysis, performance tuning, data quality and governance, security protocols management, business process analysis and optimization, quality assurance engineering, and related areas. Such a combination of relevant educational and professional background has provided him with the requisite specialized knowledge in computer and management information systems concepts. In performing his complex and specialized job duties throughout his career, Mr. Nelluri has applied advanced theoretical concepts and practical methodologies in leveraging qualitative system software testing methodologies, Cloud application configuration management, data documentation, solution test scenario planning based on the identified business requirements, networking features automaton and validation, and related areas. In this regard, to further establish and confirm the beneficiary’s qualifications for the proffered position, please find enclosed as **Exhibit B**, copies of Mr. Nelluri’s academic degree and transcripts, employment verification letters, and related professional certificates.

Moreover, as requested, enclosed please find an expert opinion letter at **Exhibit A** establishing and attesting to Mr. Nelluri’s education, training, and experience credentials, which altogether more than qualify him for the offered position of Senior Member of Technical Staff as described herein. The expert evaluation letter has been provided by Dr. Sotirios Skevoulis, Professor of Computer Science and Chair in the Seidenberg School of Computer Science and Information Systems at Pace University in New York, NY. This professor evaluation and expert opinion letter further evaluates the beneficiary’s diplomas and transcripts and experience history to confirm the beneficiary’s clear qualifications for the offered position. Also enclosed your reference are copies of Dr. Skevoulis’s curriculum vitae and related credentials, confirming his educational background and extensive experience in the field of Computer Science. They also confirm his authority to grant college-level credit for training and experience. Specifically, Dr. Skevoulis concludes as follows:

Mr. Nelluri has demonstrated progressively responsible experience in software development, test automation, defect management, and computer information systems. Through his high-level technical experience, as discussed herein, Mr. Nelluri has demonstrated a recognition of expertise in the field of Computer Information Systems. Accordingly, **I conclude that Narasimha Rao Nelluri attained the equivalent of a four-year Bachelor of Science Degree in Computer Information Systems and a four-year Bachelor of Science Degree in Electrical and Electronic Engineering from an accredited institution of higher education in the United States**.

. . .

Mr. Nelluri completed a Bachelor of Technology program of study at Kakatiya University, an accredited institution of higher education in India. Admission to the bachelor’s programs of Kakatiya University is based on graduation from high school and the completion of competitive entrance examinations. Mr. Nelluri entered Kakatiya University following his completion of high school studies. At Kakatiya University, Mr. Nelluri completed both the general studies and specialized studies that lead to a bachelor’s degree. The course of studies includes entry-level general academic courses, which are a requisite component of a bachelor's degree from an institution of higher education in the United States. Based on the subject matter and credit hours of these courses, most such courses would qualify as equivalent to courses in US institutions.

Additionally, Mr. Nelluri completed coursework in his area of specialization, Electrical and Electronics Engineering. Following his completion of the required coursework and passage of the required examinations in April 2003, Mr. Nelluri was awarded a Diploma for a Bachelor of Technology Degree by Kakatiya University. The nature of the courses and the credit hours involved indicate that he attained the equivalent of a four-year Bachelor of Science Degree in Electrical and Electronic Engineering from accredited institution of higher education in the United States.

Emphasis added. Please refer to **Exhibit A**. Dr. Skevoulis then further discusses the beneficiary’s employment in the computer information systems field, explaining:

In addition to the fulfillment of his university studies, Mr. Nelluri completed twelve years and five months of progressively responsible bachelor's-level employment experience in the field of Computer Information Systems, under the supervision of managers, and together with peers, at a bachelor's-level of practical experience. My conclusions concerning Mr. Nelluri’s professional history are based upon detailed letters of reference issued by representatives of his former employers. For purposes of this evaluation, only employment supported by detailed letters of reference has been considered.

. . .

Following my analysis of Mr. Nelluri’s education and experience and my review of relevant documentation, it is evident to me that he has demonstrated a pattern of progressively responsible expertise in Computer Information Systems**. It is my opinion that he has achieved a high level of technical expertise through progressively responsible positions directly related to the aforementioned specialty**, based on increasingly advanced job duties in software development, test automation, defect management, and computer information systems. The foregoing summarizes the work experience completed by Narasimha Rao Nelluri and specifies his responsibilities over a period of twelve years and five months of employment experience and training concentrated in software development, test automation, defect management, computer information systems, and related areas. The academic competency required to handle the duties involved in his professional background clearly is comparable to the academic background of students in bachelor's-level programs in Computer Information Systems. The responsibilities handled by Mr. Nelluri throughout his career are indicative of bachelor's-level coursework in computer information systems, software engineering, requirements gathering and analysis, systems design and analysis, software application development, programming, information technology, algorithms and data structures, technical documentation, database management systems, quality assurance engineering, and technology management.

As set forth above, Mr. Nelluri completed twelve years and five months of work experience and training in positions of progressively increasing responsibility and sophistication, characterized by theoretical and practical application of specialized knowledge under superiors, and together with peers, with baccalaureate-level education in Computer Information Systems and related areas.

Emphasis added. Please see **Exhibit A** for a copy of Dr. Skevoulis’ full letter. Following the discussion of the beneficiary’s experience, Dr. Skevoulis subsequently concludes as follows:

I find that Mr. Nelluri’s professional experience, as outlined above, is comparable to the academic background gained through a bachelor's-level educational program in Computer Information Systems or a closely related area. Additionally, it is significant that Mr. Nelluri fulfilled the equivalent of a bachelor’s degree in a technical field prior to commencing this professional experience.

. . .

By completing approximately twelve years and five months of progressively responsible professional experience in the field of Computer Information Systems after fulfilling the equivalent of a Bachelor of Science Degree in Electrical and Electronic Engineering, Mr. Nelluri fulfilled the equivalent of bachelor’s-level degrees specialized in the fields of Computer Information Systems and Electrical and Electronic Engineering. In my opinion, **the foregoing combination of academic and professional credentials indicates that the candidate gained a level of academic competence equivalent to a Bachelor of Science Degree in Computer Information Systems and a Bachelor of Science Degree in Electrical and Electronic Engineering from an accredited institution of higher education in the United States**.

. . .

Accordingly, based on the reputation of Kakatiya University, the number of years of coursework, the nature of the coursework, the grades attained in the courses, and the hours of academic coursework, as well as twelve years and five months of professional training and professional experience in software development, test automation, defect management, and computer information systems, it is my judgment that Mr. Narasimha Rao Nelluri attained the equivalent of a four-year Bachelor of Science Degree in Computer Information Systems and a four-year Bachelor of Science Degree in Electrical and Electronic Engineering from an accredited institution of higher education in the United States, and has developed a recognition of expertise in the field of Computer Information Systems.

Please refer to Exhibit A. Therefore, following evaluation of Mr. Nelluri’s education, experience, and training, we respectfully provide that his equivalent of a U.S. Bachelor of Science degree in Computer Information Systems, clearly qualifies Mr. Nelluri to perform the duties of the offered specialty occupation.

**Conclusion**

We trust that the foregoing establishes the beneficiary’s qualifications for the proffered position. On the basis of the additional information and documentation provided, we respectfully request that the Service now proceed in approving the H-1B nonimmigrant visa petition on behalf of our employee. Thank you for your continued attention to this matter.

Very truly yours,

Kenneth Thompson / Yun Choi

Global Talent Immigration Partner

1. Please note that this occupation code has since been sub-divided into Software Developers (15-1252.00) and Software Quality Assurance Analysts and Testers (15-1253.00). [↑](#footnote-ref-1)