April 15, 2021

Department of Homeland Security

United States Citizenship and Immigration Services

California Service Center

24000 Avila Road, 2nd Floor

Rm 2312

Laguna Niguel, CA 92677

**RE: L-1B Petition for Temporary Professional Employee and Request for Extension**

Petitioner: Amazon.com Services LLC (“Amazon-US”), a wholly-owned subsidiary of Amazon.com, Inc.

Beneficiary: **BYLADAKERE SOMASHEKARAIAH, Sharath** (the “Beneficiary”)

U.S. Position: **Business Intelligence Engineer III**

Period Requested: 10/10/2021 – 07/01/2022

Dear Sir or Madam:

Amazon-US submits this letter in support of its petition for L-1B nonimmigrant status so that the Beneficiary may continue to serve in the specialized knowledge position of Business Intelligence Engineer III for a temporary period of eight months, subject to our standard employment at-will policy. The Beneficiary qualifies for L-1B status because the Beneficiary performed in a specialized knowledge capacity as Business Analyst with Amazon Development Centre (India) Private Limited, (“Amazon-India”) in Bangalore, India without interruption from September 10, 2012 to October 18, 2016.

**The Beneficiary is eligible for L-1B nonimmigrant status**

1. **Qualifying corporate relationship:** Amazon-US and Amazon-India are both wholly-owned subsidiaries of Amazon.com, Inc., and therefore qualify as related corporate entities under the Immigration and Nationality Act.

1. **Bachelor’s degree:** The Beneficiary earned a Bachelor’s degree in Telecommunication Engineering from the Visvesvaraya Technological University, which has been evaluated to be the equivalent of a US Bachelor’s degree in Electronic Engineering.
2. **The proffered position requires specialized knowledge:** The Beneficiary is being offered a full-time specialized knowledge position as a Business Intelligence Engineer III at Amazon-US.
3. **At least one year of continuous full-time employment abroad in a specialized knowledge position:** The Beneficiary was employed as a full-time Business Analyst at Amazon-India from September 10, 2012 to October 18, 2016.

***The Beneficiary’s Specialized Knowledge Role Abroad***

In the Beneficiary’s specialized knowledge role at Amazon-India, the Beneficiary was a critical member of the Amazon Compliance Operations (“COPS”) team, which consisted of 400 members, and was comprised of 1 Director, 3 Site Leaders, 6 Senior Operations Managers, 8 Operations Managers, 14 Compliance Managers, 3 Business Analysts, 17 Subject Matter Experts, and 348 Associates. Mr. Byladakere Somashekaraiah was one of the most senior members of this team with Amazon-India, and served as a mentor for at least 2 Business Analysts, 2 Compliance Managers, 5 Subject Matter Experts, and 50 Associates.

On this team, the Beneficiary served as a Business Analyst, and was an invaluable member of the Compliance Operations team, finding relevant data sources, building data queries, transforming data into a usable state, designing and building dashboards, and analyzing data patterns to help leadership make business-critical decisions. As a Business Analyst, Mr. Byladakere Somashekaraiah used Amazon-proprietary software development technologies and platforms to extract, transform, aggregate and manipulate massive volumes of data in support of business-critical programs. He gained highly specialized knowledge of Amazon-specific technologies while developing new features for the Compliance Operations team which aided in the support of multiple programs such as Restricted Products, Dangerous Goods, and Imported Products. Specifically, Mr. Byladakere Somashekaraiah delivered several key projects, including the development of automated dashboards for Weekly and Monthly Business Reporting (WBR/MBR) using ETL Manager, Redshift, S3, and Grasshopper, in combination with his Excel and SQL expertise. Furthermore, he gained particular expertise in Amazon’s suite of interlocking tools with unique business intelligence functionalities, enabling him to design scalable solutions, build engineering tools, and quickly improve the effective time needed to develop code, identify deficiencies and vulnerabilities and solve them, and present actionable findings and analysis to the leadership team of the Compliance Operations team for Amazon WW.Mr. Byladakere Somashekaraiah’s technical expertise and experience with Amazon-internal tools and technologies had a direct impact on the growth of Amazon’s development center in Bangalore, India, and singled him out as uniquely qualified for transfer to the U.S. team. **The level of expertise** **Mr. Byladakere Somashekaraiah acquired with Amazon-India is extremely uncommon within Amazon and non-existent outside of Amazon, and undoubtedly advanced Amazon’s competitiveness in the global marketplace**.

Specifically, the Beneficiary performed the following job duties, all of which require extensive specialized knowledge of Amazon’s internal tools, technologies, products, procedures, and processes:

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| --- | --- | --- |
| **Job Duties** | **% of Time Spent on duty** | **Amazon’s products, services, tools, research, equipment, techniques etc. requiring specialized knowledge** |
| Defining Management Information reporting requirements and compliance-related dashboards to enable an integrated approach covering all compliance topics.   * Collaborate with Business teams to distill specific data requirements from high-level business goals * Extract data from Data Warehouse and build data pipelines through ETLM, S3 and Redshift * Analyze Data for the accuracy of data and provide perspective to leaders on how to view the metrics. | 15% | Simple Storage Service, Redshift, ETLM, VIRT Dashboard |
| Building a compliance organization-level reporting dashboard to help management understand challenges and risks faced around compliance.   * Build an easy to understand and lite Dashboard using Redshift, ETLM. * Refresh and circulate Dashboards and reports to customers on a daily basis using Amazon metrics. | 15% | Simple Storage Service, Redshift, ETLM, VIRT Dashboard |
| Understanding requirements from leadership and Product Compliance teams and mapping them with data sources / data warehouse.   * Present various designs and views for leadership using the Redshift, VRIT dashboard. * Review and dive deep into various data tables in ETLM to identify a suitable data source. * Incorporate the new data source into the existing views. | 15% | Redshift, ETLM, VIRT Dashboard |
| Guiding and mentoring junior analysts on how to use Amazon’s proprietary tools and technologies.   * Create a code library in ETLM for junior Analysts to reuse code/components to save time during development. * Create training materials and share best practices with junior Analysts to reduce their learning curve. | 10% | Redshift, ETLM, VIRT Dashboard |
| Executing high priority (i.e. cross-functional, high-impact) projects to improve operations performance with the help of Analytics Managers.   * Perform data analysis on large datasets to identify patterns using Redshift and ETLM and build models to support the hypothesis. | 10% | Redshift, ETLM, VIRT Dashboard |
| Planning resourcing, analyzing and reporting daily, weekly, and monthly metrics, and identifying trends and opportunities to reduce cost and improve processes.   * Create a Productivity Metrics system using Redshift, ETLM to plan and track headcount correctly. * Enable multiple stakeholders to perform their tasks effectivity. | 20% | Redshift, ETLM, VIRT Dashboard |
| Partnering with stakeholders as a part of the solution process, to potentially minimize revenue impacts owing to compliance actions. | 15% | Redshift, ETLM, VIRT Dashboard, S3 |

The Beneficiary’s job duties abroad required specialized and advanced knowledge that can only be gained by working for Amazon. As noted above, the Beneficiary gained a unique combination of skills in the Beneficiary’s role at Amazon-India. For this reason, the Beneficiary was identified as one of the most technically outstanding members of his team.

In particular, the Beneficiary gained a level of expertise in a number of Amazon tools and technologies that is rare to find, even within Amazon, and is impossible to find outside of the company. These include the following:

* Redshift: Amazon Redshift is a fast, fully managed, petabyte-scale data warehouse that makes it simple and cost-effective to analyze data using existing Amazon business intelligence tools. **Mr. Byladakere Somashekaraiah will continue to use Redshift to consolidate Display Ads Finance data and manage the unified database for Amazon-US, and will design and develop the data architecture needed for other Analysts to use for reporting.** Only 3 employees at Amazon-India, including the Beneficiary, had working knowledge of this tool out of a team of approximately 400 people
* Extract Transform Load Manager (ETLM): The core "operating system" of the Data Warehouse. This complex system manages all of the injection and extraction of data in a consistent and predictable way. Users interact with ETLM through the Datanet web application by scheduling load or extract jobs and defining where to retrieve or pull the data. **Mr. Byladakere Somashekaraiah will continue to use ETLM to retrieve Amazon-wide data, transform and load the data into new data tables created in Redshift**. Less than 20 employees at Amazon-India, including the Beneficiary, had working knowledge of this tool out of a team of approximately 400 people
* Simple Storage Service (S3): S3 is a reliable, fast and cheap way to store data on the Internet. S3 can be used to store just about anything: XML documents, binary data, images, videos, or whatever else the customer needs to store. **Mr. Byladakere Somashekaraiah used S3 in combination with Redshift extensively in his role for Amazon-India. Specialized knowledge of this tool is necessary at Amazon-US to store data efficiently and to keep historical data and populate data tables**. Only 2 employees at Amazon-India, including the Beneficiary, had working knowledge of this tool out of a team of approximately 400 people.
* Remedy / Simple Issue Manager (SIM): Remedy and SIM are platforms that unify issue management and workflow applications at Amazon, including tickets, backlogs, and sprints, and are owned by the Service, Website, and Issue Management Team. At Amazon, Engineers leverage these platforms to build company-wide systems. **His specialized knowledge of** **these tools will allow Mr. Byladakere Somashekaraiah to continue to organize and prioritize projects appropriately by collecting requirements and assigning tasks based on prioritization.** Only 2 employees at Amazon-India, including the Beneficiary, had knowledge of these tools out of a team of approximately 400 people

Grasshopper: Grasshopper is a visual query-building interface for the Amazon Data Warehouse. It is best suited for Users who do not want to write SQL queries. This tool is used with VIRT dashboard and is similar to ETLM, but without SQL. This is a well-established tool at Amazon, and **Mr. Byladakere Somashekaraiah will continue to use it as a reference for the Amazon Quicksight integration with Redshift tables**. Less than 100 employees at Amazon-India, including the Beneficiary, had working knowledge of this tool out of a team of approximately 400 people

The Beneficiary played a key role in several critical projects for Amazon-India, including the following:

* Compliance Ops Automated Metrics Dashboard: Compliance Operations was growing at a rapid pace, but did not have any mechanism to monitor the entire operation. Manual operations monitoring was reducing the pace of program’s growth, and the lack of visibility to leadership on the performance of the program was causing issues. **Mr. Byladakere Somashekaraiah utilized his expertise in Redshift, Amazon ETLM, Grasshopper, and VIRT Dashboard to build an Excel-integrated automated dashboard which enabled business users to easily navigate and monitor key metrics.** His automated metrics dashboard saved the effort of 4 full-time employees on the team, who no longer needed to pull the data manually and organize it to get an assessment of the program. Mr. Byladakere Somashekaraiah’ s specialized knowledge of these technologies will be exceptionally valuable for the U.S. team to establish similar reporting programs in the U.S. Mr. Byladakere Somashekaraiah’ s specialized knowledge of the tools he used to create this dashboard distinguishes him from other Amazon employees in his field.
* Compliance Ops Personnel Expansion: With an ever-increasing amount of data and requests, it was impossible for one person to manage the data management workload of the entire team. To enable his team mates to self-serve their data needs, **Mr. Byladakere Somashekaraiah conducted trainings on a number of Amazon-internal Business Intelligence technologies** (such asGrasshopper, Amazon's tool for non-tech users to retrieve data) **for over 100 Associates and Managers,** and trained 20 employees on ETML. His expertise in these technologies eliminated the ramp-up time required for the Business Analyst I role for many employees. Mr. Byladakere Somashekaraiah specialized skills and experience with Amazon’s suite of interlocking tools with unique business intelligence functionalities Amazon’s proprietary data management tools at massive scale with no room for error make him a unique fit for the most critical Business Intelligence initiatives of the Amazon-US Alexa Connected Devices team.

As detailed above, the Beneficiary has developed an extremely rare skillset through the Beneficiary’s 4 years of experience working for Amazon abroad, and the Beneficiary’s transfer to the US is critical for the US operation to meet its business objectives in an increasingly competitive marketplace.

***The Beneficiary’s Specialized Knowledge Role in the U.S.***

Amazon-US is continuing to offer the Beneficiary employment in the specialized knowledge position of Business Intelligence Engineer III. In this role, the Beneficiary will continue to work with the Alexa Connected Devices team, which is responsible for serving Amazon Alexa customers by building user-facing features that help customers seamlessly use multiple devices, skills, and agents. We strive to simplify everyday life by making Amazon Alexa ambient (customers no longer see Alexa as "in a device"), personal (customers feel like Alexa knows them) and natural (customers choose Alexa to complete a task because it's the easiest way to get something done. This is directly connected company’s overall objectives to make the Amazon Alexa but easy to use and generate more revenue.

On this team, the Beneficiary serves as a Business Intelligence Engineer III, where the Beneficiary is a key employee and owns the data domain for the entire Alexa Connected Devices organization. He is responsible to size, scope, build, and maintain Alexa’s data infrastructure, and to find relevant data sources, build data queries, store, transform data into a usable state, design and build dashboards, and analyze data patterns for the business team and stakeholders to display and manage business-related data and make effective decisions. He also partners with Alexa-internal service and business teams to identify process and system improvement opportunities. Mr. Byladakere Somashekaraiah is essentialto the Alexa Connected Devices organization, which needs to have access to 100% accurate data within a short period of time, and scalable mechanisms to extract, transform, aggregate and manipulate massive volumes of data in support of business-critical programs for multiple stakeholders and leadership.

Mr. Byladakere Somashekaraiah is the first Sr. BIE in the Alexa Connect Devices organization, and is responsible for defining the BI goals and vision of the entire 250 team organization. He has lead the development of many of the tools used for BI needs within Alexa, has particularly specialized knowledge of SQL, building dashboards using Quicksight and Tableau, and is a Subject Matter Expert for SQL, dash boarding, and on data models for Alexa Connected Devices. He also leads trainings on Quicksight and Redshift SQL to enable his team members to self-serve their team’s data needs and build dashboards for the business needs. The projects he is currently working on at Amazon-US are designed to enable quicker and more streamlined availability of data, which will reduce the manual work required to process Alexa business data. Faster data processing will enable Alexa business and finance teams to be more productive, pivoting to new opportunities more quickly. Furthermore, the dashboards that Mr. Byladakere Somashekaraiah builds enable efficient and meaningful discussions on the progress the organization makes toward satisfying business needs, and also allow leadership to identify new opportunities that will in-turn enable higher revenue for Amazon.

Specifically, the Beneficiary will be responsible for the following specialized knowledge job duties:

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| **Job Duties** | **% of Time Spent on duty** | **Amazon’s products, services, tools, research, equipment, techniques etc. requiring specialized knowledge** |
| * Translate complex or ambiguous business problem statements into analysis and reporting requirements. * Proactively and independently work with stakeholders to construct use cases and associated standardized outputs. | 20% | S3, EDX, Redshift, ETLM, ADW, Athena , Amazon Metrics, Quick sight |
| * Build data pipelines to bring in and store data in a scalable and sustainable manner. | 15% | S3, EDX, Redshift, ETLM, ADW, Athena. |
| * Build meaningful dashboards and visualizations to help leadership find answers to problem in easy and rapid pace. | 15% | S3, EDX, Redshift, ETLM, ADW, Athena , Amazon Metrics, Quick sight |
| * Size, scope, build, and maintain metrics and queries for weekly, monthly, quarterly, and annual reports for organization and stakeholders to manage the Alexa business and make effective decisions. | 10% | S3, EDX, Redshift, ETLM, ADW, Athena , Amazon Metrics, Quick sight |
| * Scale data processes and reports. * Write queries that stakeholders can update themselves or can be automated. * Leverage specific knowledge of the data available or needed by the wider business for more complex or comparative analysis and the ability to work with a variety of different data sources to produce new reports per the needs of the business. | 15% | S3, EDX, Redshift, ETLM, ADW, Athena , Amazon Metrics, Quick sight |
| * Optimize source data to maximize reporting automation. * Identify and adopt best practices in reporting and analysis, data integrity, test design, analysis, validation, and documentation. | 15% | S3, EDX, Redshift, ETLM, ADW, Athena , Amazon Metrics, Quick sight |
| * Partner with internal teams to identify process and system improvement opportunities. * Continuously test and improve predictive models with new data inputs. | 10% | S3, EDX, Redshift, ETLM, ADW, Athena , Amazon Metrics |

The Beneficiary’s job duties in the U.S. will require specialized and advanced knowledge that can only be gained by working for Amazon. As noted above, the Beneficiary will be required to use a unique combination of skills in the Beneficiary’s role at Amazon-US. Copied below is a list of the Amazon patented, proprietary tools and technologies required by the U.S. position:

* Redshift: Amazon Redshift is a fast, fully-managed, petabyte-scale data warehouse that makes it simple and cost-effective to analyze data using existing Amazon business intelligence tools. **Mr. Byladakere Somashekaraiah will continue to use Redshift to consolidate Display Ads Finance data and manage the unified database for Amazon-US.**
* Extract Transform Load Manager (ETLM): The core "operating system" of the Data Warehouse. This complex system manages all of the injection and extraction of data in a consistent and predictable way. Users interact with ETLM through the Datanet web application by scheduling load or extract jobs and defining where to retrieve or pull the data. **Mr. Byladakere Somashekaraiah will continue to use ETLM to retrieve Amazon-wide data, transform and load the data into new data tables created in Redshift.**
* Elastic Data eXchange (EDX): EDX is designed to be Amazon's one-stop shop for all en-masse data, with an emphasis on large-scale data interchange. EDX is about connecting data from providers to their consumers, and providing the service to manage the persistence of that data. There is a growing need for bulk data storage and efficient transport of data within the Alexa organization. Many Alexa customer teams are forced to build one-off solutions in order to effectively manage ingress and egress of bulk data across systems, adding to operational challenges. The EDX service is aimed at solving similar problems for all teams which are in need of securely managing data movement and access. **Mr. Byladakere Somashekaraiah will continue to use EDX in combination with the Redshift to move data quickly and efficiently so that the Display Ads Finance team and stakeholders can view all necessary data in once source.**
* Simple Storage Service (S3): S3 is a reliable, fast and cheap way to store data on the Internet. S3 can be used to store just about anything: XML documents, binary data, images, videos, or whatever else the customer needs to store. **Mr. Byladakere Somashekaraiah used S3 in combination with Redshift extensively in his role for Amazon-India. Specialized knowledge of this tool is necessary at Amazon-US to store data efficiently and to keep historical data and populate data tables**
* Amazon Athena: Amazon Athena is an interactive query service that makes it easy to analyze data in Amazon S3 using standard SQL. Athena is server less, so there is no infrastructure to manage, and users only pay for the queries that they run. **Mr. Byladakere Somashekaraiah will continue to integrate the data from Amazon Athena to Display ads Redshift cluster using EDX.**
* Amazon Metrics: At Amazon, it is very common to have regularly-produced metrics decks that are comprised of Excel files linked to the output of one or more Data Warehouse queries (Datanet Data Feed jobs). Traditionally, this requires manual effort to refresh the data and to initiate the calculation of the workbook. Metrics jobs are a new type of Datanet job that allows the inclusion of data feed job results into Microsoft Excel documents, and perform worksheet calculation as the final step in the Datanet dependency chain. **Mr. Byladakere Somashekaraiah will continue train the team on using Amazon Metrics to build Excel Decks to move the computation from Excel to Amazon Metrics.**
* Amazon QuickSight: Amazon QuickSight is a very fast, cloud-powered business intelligence (BI) service that makes it easy for all employees to build visualizations, perform ad-hoc analysis, and quickly get business insights from their data. Amazon QuickSight uses a new, Super-fast, Parallel, In-memory Calculation Engine (“SPICE”) to perform advanced calculations and render visualizations rapidly. Amazon QuickSight integrates automatically with AWS data services, enables organizations to scale to hundreds of thousands of users, and delivers fast and responsive query performance to them via SPICE’s query engine. At one-tenth the cost of traditional solutions, Amazon QuickSight enables the user to deliver rich BI functionality to everyone in an organization. **Mr. Byladakere Somashekaraiah will continue to integrate this tool with the database tables, to create dashboards and visualizations which provide Display Ads Finance data to stakeholders without the need for writing SQL.**
* Remedy / Simple Issue Manager (SIM): Remedy and SIM are platforms that unify issue management and workflow applications at Amazon, including tickets, backlogs, and sprints, and are owned by the Service, Website, and Issue Management Team. At Amazon, Engineers leverage these platforms to build company-wide systems. **His specialized knowledge of** **these tools will allow Mr. Byladakere Somashekaraiah to continue to organize and prioritize projects appropriately by collecting requirements and assigning tasks based on prioritization.**

The Beneficiary will continue to serve as a key leader for several critical projects for Amazon-US, including the following:

* **Alexa Connected Devices Data Infrastructure:** As part of the 2020-2022 initiative roadmap, Mr. Byladakere Somashekaraiah will be inventing the Alexa Connected Device data infrastructure, including projects to 1) create a data infrastructure to host the required data and ensure its accuracy, 2) apply business rules and context to the hosted data to make the data meaningful, and display it to stakeholders and leadership, 3) provide the tools and knowledge to retrieve the necessary data by enabling self-service tools and providing technical support, and, 4) using statistical tools to create low-cost models to help solve business problems. **Mr. Byladakere Somashekaraiah will be using S3, EDX, Redshift, ETLM, Athena to retrieve data (S3 & Athena), store data (S3, EDX, and Redshift) and transform the data between tools (ETLM).**
* **Multi Agent Analytics:** “Powered by Alexa” is a developer program to allow users to build their own voice assistants (agents) using Alexa’s stack, for a fee. PBA agents can license domains, rendering Alexa’s domain responses in their own, custom TTS voice. PBA agents can also “handoff” to Alexa, (e.g. the customer says, “Benson, buy eggs”, Benson says, “Lemme get Alexa for that”, Alexa says, “Alexa here, and I bought eggs”). Because the utterances (dialogs) for PBA agents flow through the same stack and systems as Alexa, Amazon can measure their usage, analogous to how Amazon measures Alexa’s usage today. For each dialog/utterance, Alexa’s systems indicate the requested agent (the agent that the customer invoked with the wake word. In the example above, the requested agent would be ‘Benson’) and the responding agent (the one that actually responded to the customer). Alexa Connected Devices needs the ability to measure the customers’ usage and the economic value of the various agents (e.g. DEV/EVE), compared to control cohorts on same device types, and agent’s quality (e.g. agent dialogs that end in failed utterances or non-purposeful “dead-ends”). **Mr. Byladakere Somashekaraiah will be using S3, EDX, Redshift, ETLM, Athena to retrieve data (S3 & Athena), store data (S3, EDX, and Redshift), transform the data between tools (ETLM) and define metrics and create a dashboard (QuickSight) to provide Alexa with this insight.**
* **Multi-Device Adoption & Experience Dashboard (MDAD):** Alexa routinely needs to collect data on multi-device spaces to inform prioritization discussions. To assist with this, Connected Devices leadership would like to turn simple queries into proper dashboards. This project will create a Quicksight dashboard which refreshes on a weekly basis with all the necessary filters to analyze and categorize the data, providing readily available data for PRFAQs. **Mr. Byladakere Somashekaraiah will be using Redshift, ETLM to retrieve, store data (Redshift), transform the data between tools (ETLM) by applying complex business logics, define metrics, and create the dashboard (QuickSight).**

Because the position requires a highly technical combination of expertise, performing advanced engineering techniques using Amazon’s proprietary tools and technologies, the position has been classified as one of the most technically advanced within the Amazon organization. For this reason, only a candidate with truly specialized and advanced knowledge as a Business Analyst at Amazon could successfully perform the duties required by the role.

**Amazon’s L-1B Nonimmigrant Petition Should be Approved**

Amazon’s L-1B Nonimmigrant Visa Petition on behalf of the Beneficiary should be approved. Amazon-US will offer the Beneficiary temporary employment as Business Intelligence Engineer III, at an annual salary of $114,400.00 plus standard company benefits. The Beneficiary is uniquely qualified to serve in this position by virtue of the Beneficiary’s extensive knowledge and experience with proprietary Amazon technologies, tools, products, processes and services. Amazon stands alone amongst all of its competitors in terms of the massive scale of its technology and constant evolution of the spheres in which it operates. Amazon has its own set of over 10,000 proprietary services that are constantly evolving to keep up with new technological developments. It is critical for Amazon to be able to transfer experienced engineers like the Beneficiary in order to meet its business needs and stay ahead of its competitors.

Thank you for your kind attention to this matter.

Very truly yours,

Enis Garcia, Christian Denman, Jenny Batenhorst, and Sheetal Aroda

HR Immigration