December 3, 2019

U.S. Citizenship & Immigration Services

California Service Center

**ATTN: Premium Processing**

24000 Avila Road

2nd Floor, Room 2302

Laguna Niguel, CA 92677

**RE: REQUEST FOR EVIDENCE**

**Receipt #: WAC-19-288-50144**

**Form: I-129, Petition for Nonimmigrant Worker**

**Petitioner:** **Amazon.com Services, Inc.**

**Beneficiary: Mr. Sharath BYLADAKERE SOMASHEKARAIAH**

To Whom It May Concern:

My name is Gayathri Shankar and I am an EMEA Operations Manager with Amazon.com Services, Inc. in Luxembourg. I previously served as Mr. Byladakere Somashekaraiah’s direct line manager at Amazon Development Centre (India) Private Limited, in Bangalore, India (“Amazon-India”). During this time I was Mr. Byladakere Somashekaraiah’s direct supervisor and, as such, I am qualified to attest to the specialized nature of Mr. Byladakere Somashekaraiah’s position.

1. **Mr. Byladakere Somashekaraiah was employed by Amazon-INDIA for at least one continuous year**

Mr. Byladakere Somashekaraiah was employed with Amazon-INDIA in the critical role of Business Analyst from September 10, 2012 to November 9, 2016. During that time, Mr. Byladakere Somashekaraiah served as an invaluable member of Compliance Operations (“COPS”) team, and he spearheaded critical projects for the group. The Compliance Operations team was responsible for owning the complete data domain for COPs and building relational databases as part of the HS3C Unified Redshift Data Cluster.

Mr. Byladakere Somashekaraiah was selected as a unique candidate for transfer to the United States because he developed a niche expertise in implementing a complex array of Amazon proprietary technologies. His level of expertise is not only non-existent outside of Amazon, **but extremely uncommon within the company. Compared to his teammates, he has developed an uncommon set of highly specialized skills.**

1. **Mr. Byladakere Somashekaraiah gained special and advanced knowledge of Amazon proprietary tools and technologies through employment with Amazon-INDIA.**

During Mr. Byladakere Somashekaraiah’s tenure, the Compliance Operations team consisted of 400 members, comprising 3 Business Analysts, 1 Director, 3 Site Leaders, 6 Senior Operations Managers, 8 Operations Managers, 14 Compliance Managers, 17 Subject Matter Experts, and 348 Associates. Mr. Byladakere Somashekaraiah was one of the most senior members on his 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.

At Amazon-INDIA, Mr. Byladakere Somashekaraiah used his knowledge of Amazon-specific technologies to develop new features for the Compliance Operations team that would aid in support for multiple programs such as restricted products, dangerous goods, and imported products. While employed with Amazon-INDIA, Mr. Byladakere Somashekaraiah delivered several key projects, including automated dashboards that he builtfor Weekly and Monthly Business Reporting (WBR/MBR) using ETL Manager, Redshift, S3, and Grasshopper in combination with his Excel and SQL expertise. As a member of the Compliance Operations team, Mr. Byladakere Somashekaraiahwas responsible for finding relevant data sources, building data queries, transforming data into a usable state, designing and building dashboards, and analyzing data patterns to assist leadership. Mr. Byladakere Somashekaraiah’s technical expertise and experience with Amazon helped the growth of Amazon’s development center in Bengaluru, India, and singled him out as uniquely qualified for transfer to the U.S. team.

1. *Mr. Byladakere Somashekaraiah has been employed abroad in a capacity involving assignments that have significantly enhanced the Amazon’s productivity, competitiveness, and financial position.*

During Mr. Byladakere Somashekaraiah’s employment as a Business Analyst with Amazon-INDIA, he served as an invaluable member of the Compliance Operations team. As a Business Analyst, he used Amazon proprietary development technologies and platforms to extract, transform, aggregate and manipulate massive volumes of data. In doing so, he gained highly specialized knowledge necessary to quickly improve the effective time needed to develop codes and identify and solve their deficiencies and vulnerabilities on the Compliance Operations team for Amazon. Mr. Byladakere Somashekaraiah was selected as a unique candidate for transfer to the United States because while at Amazon-INDIA, he gained extensive special knowledge and advanced understanding of Amazon’s proprietary tools and technologies. Specifically, he gained expertise in a suite of interlocking Amazon tools with unique business intelligence functionalities to design scalable solution, build engineering tools and present the findings and analysis to the leadership team. **The level of expertise** **Mr. Byladakere Somashekaraiah acquired with Amazon-INDIA is not only non-existent outside of Amazon, but extremely uncommon even within Amazon, and undoubtedly advanced Amazon’s competitiveness in the global marketplace**.

Specifically, Mr. Byladakere Somashekaraiah played a pivotal role working on the following projects:

* Compliance Operations is growing with rapid pace did not have Automated Dashboards to monitor the entire operations. The lack of automated dashboards was reducing the pace of program growth and inhibiting visibility to leadership on the performance. **Mr. Byladakere Somashekaraiah utilized his expertise in Redshift, Amazon ETLM, Grasshopper, VIRT Dashboard to build an Excel based automated dashboard which helped business users easily navigate and monitor key metrics.** This helped save a 4 full time employees for his team as they no longer needed to pull the data manually and organize them. His specialized knowledge of these technologies will be highly valuable for the U.S. team as they will also require for his role in the U.S. Mr. Byladakere Somashekaraiah’ s specialized knowledge over the past three and a half years distinguishes him from other Amazon employees in his field.

* The large amount of data and requests on the Compliance Operations team were impossible to manage by one person. To make processes self-serving**, Mr. Byladakere Somashekaraiah conducted trainings on a number of technologies for his associates and managers such as:** Grasshopper (Amazon's tool for non-tech users to retrieve data) to over 100 associates/managers and ETML to 20 employees. His expertise in these technologies will eliminate ramp-up time in the Business Analyst I role as these specialized skills make him a unique fit for the most critical initiatives for the team.
* While working on the HS3C database cluster, Mr. Byladakere Somashekaraiah built automated dashboards for weekly, monthly, and quarterly business reporting suing ETL Manager, Redshift, S3, and Grasshopper in combination with his Excel and SQL expertise. However to collaborate between varies leaders in multiple counties was a cumbersome task. **To ease it out Mr. Byladakere Somashekaraiah created a SharePoint solution to collaborate between teams**. This saved about 1 day a week work to consolidate documents. These skills directly transfer to the needs of the team.

Mr. Byladakere Somashekaraiah was one of the most senior Business Analysts on the Compliance Operations team at Amazon-INDIA and he was identified as a key employee for transfer to the U.S. because of his significant contributions to the above-mentioned projects and depth of technical expertise in Amazon- specific technologies. Specifically, Mr. Byladakere Somashekaraiah was transferred because he brings deep knowledge in Amazon proprietary tools, such as Redshift, ETLM, VIRT, Dashboard, and S3, which are necessary to the successful execution of projects in the Amazon data warehouse. The data warehouse contains more than 10,000 data tables and error types related to these tools, and Mr. Byladakere Somashekaraiah has detailed knowledge of suitable methods to connect between tools that none of his colleagues in the U.S. possess.

1. *Mr. Byladakere Somashekaraiah’s specialized knowledge normally can be gained only through prior experience with an Amazon affiliate or subsidiary.*

Mr. Byladakere Somashekaraiah’s understanding of Amazon- specific tools and technologies is distinguishable from others in the industry, as it can only be gained through a substantial amount of hands-on experience with an Amazon affiliate or subsidiary. Amazon uses its own proprietary technologies to implement numerous features and functionality that simplify and improve the customer shopping experience. Amazon’s strategy is to focus development efforts on creating and enhancing the specialized, proprietary software that is unique to the business and unknown to its industry competitors. An individual who does not possess the extensive experience attained by Mr. Byladakere Somashekaraiah during his tenure with Amazon-INDIA would not have the necessary knowledge of the unique systems, tools, and technologies Amazon uses for its operations. **Prior experience in implementing a complex array of multivariate Amazon internal tools is a rare ability even within Amazon. It is for this experience that Mr. Byladakere Somashekaraiah has been selected for the U.S. role.**

The following chart sets forth Mr. Byladakere Somashekaraiah’s duties as a Business Analyst abroad, the amount of time spent on each duty, and the Amazon proprietary tools associated with each:

|  |  |  |
| --- | --- | --- |
| **Specific Job Duty** | **% of Time Spent** | **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 accuracy 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 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 the leadership and product compliance teams and mapping them with data sources / data warehouse.   * Present the various design and views for leadership using the Redshift, VRIT dashboard. * Review and dive deep into various data tables in ETLM to seek the 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.   * Creating Code library in ETLM for junior analyst to reuse the codes to save time for development * Create training material and sharing best practices to junior analyst to reduce the 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.   * Conduct data analysis on large datasets and identify the patterns using Redshift and ETLM to build Models to support the hypothesis. | 10% | Redshift, ETLM, VIRT Dashboard |
| Planning resourcing, analyzing and reporting daily, weekly and monthly metrics; identifying trends and opportunities to reduce costs and improve processes.   * Create a Productivity Metrics using Redshift and ETLM to plan and track the Headcount correctly, which enabled multiple other stakeholders to perform their tasks effectively. | 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 |
| **Total** | **100%** |  |

Individuals who have not been exposed to the sophisticated technology involved would not have the technical finesse to perform Mr. Byladakere Somashekaraiah’s role. Even the vast majority of Amazon employees who have gained experience with some of the proprietary tools and technologies above would not have the depth of technical knowledge and business acumen that Mr. Byladakere Somashekaraiah developed working as Business Analyst and leading the critical projects that he was able to see through during his tenure.

1. *Mr. Byladakere Somashekaraiah possesses knowledge of Amazon’s tools and technologies that cannot be easily transferred or taught to another individual without significant economic cost or inconvenience.*

The specialized nature of Mr. Byladakere Somashekaraiah’s position on the Compliance Operations team required an expert-level of understanding of Amazon’s proprietary tools and technologies. He has fine-tuned his niche perspective in designing and balancing the interplay of multiple highly-technical Amazon proprietary tools. It would consume an extensive period of time to train a new hire up to the level of special knowledge Mr. Byladakere Somashekaraiah attained during his tenure at Amazon-INDIA. His direct hands-on experience made him a unique and qualified candidate for the offered U.S.-based role.

Mr. Byladakere Somashekaraiah was identified as a key employee for transfer to the US by virtue of his strong domain knowledge, technical expertise, and excellent performance. Mr. Byladakere Somashekaraiah was specifically selected for transfer to the U.S. because of his outstanding performance, as evidenced by the numerous promotions he earned during his tenure at Amazon-India. He was hired as a Catalog Associate in September 2012. Since then, he has been promoted to Subject Matter Expert 1 (October 2013), Subject Matter Expert 2 (April 2015), and Business Analyst (November 2015). In 2014, at the annual Global Rewards and Recognition, he was recognized as one of a few employees that went “Above and Beyond” for performing barcode reconciliation for twenty-four (24) vendors.

Mr. Byladakere Somashekaraiah’s experience abroad at Amazon-India is relevant to his proposed responsibilities to Amazon’s U.S. team. He was identified as a key employee for transfer because he was the first Business Analyst on the COPs team. Mr. Byladakere Somashekaraiah will use his specialized knowledge of Amazon’s proprietary tools to drive the majority of business analytics and will support cross-functional teams with data and analyses to drive improvements and new projects. It is estimated that hiring someone in the U.S. would take 6 months or more and at least twelve to eighteen months to ramp up to fully understand all systems. This lead time will increase the risk of not having high critical financial reports to Amazon businesses. It would take twelve to eighteen months to ramp up a new hire because the candidate initially needs to develop understanding of (a) all the Amazon proprietary tools required for projects (3-4 months to get to an intermediate level of understanding); (b) the different data sources available like multiple Redshift clusters, VIRT Dashboard, RDS, and S3 (another 4 to 5 months); (c) the existing Amazon-wide data tables at a granular level regarding how the data is stored, how data tables interact with each other, and what the data represents (an additional 4-5 months); and (d) suitable methods to apply specific to Amazon clusters according to a given context (an additional three months). In addition, one needs to have advanced skills in SQL coding, HTML, Excel, VBA, hands on experience building complex queries, databases and dashboards, troubleshooting errors and exception handling, and have a deep understanding of the overall Amazon business to present the data in Amazon standards, which requires at least twelve to eighteen months to master and be self-sufficient.

Prior to his tenure with Amazon-India, in April 2013 Mr. Byladakere Somashekaraiah earned a Bachelor of Engineering Degree in Telecommunication Engineering from Visvesvaraya Technological University, Belgaum in India. This degree has been evaluated by the Trustforte Corporation and deemed to be equivalent to a four-year Bachelor of Science Degree in Electronic Engineering from an accredited institution of higher education in the United States. As part of his academic curriculum, Mr. Byladakere Somashekaraiah completed coursework directly related to the offered position.

1. *Mr. Byladakere Somashekaraiah has knowledge of Amazon tools and technologies that are sophisticated, complex, and of a highly technical nature.*

As outlined in sections above, Mr. Byladakere Somashekaraiah’s positions require that he apply highly technical, cutting-edge, and difficult Amazon proprietary tools and technologies. Mr. Byladakere Somashekaraiah’s understanding of these tools stand out from that of his colleagues, as he possesses advanced knowledge of these tools within the context of the US team. His role at Amazon-INDIA required him to constantly manipulate and analyze the following proprietary tools and technologies:

* Redshift: Amazon Redshift is a fast, fully managed, petabyte-scale data warehouse that makes it simple and cost-effective to analyze all your data using your existing business intelligence tools. **Mr. Byladakere Somashekaraiah will continue to use Redshift to consolidate Display Ads Finance data and manage the unified database.** In Redshift Mr. Byladakere Somashekaraiah designed and developed the Data architecture needed for other analysts to use for reporting. Only 3 people 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 into new data tables created in Redshift**. Less than 20 people had working knowledge of this tool out of a team of approximately 400 people at Amazon-India.
* 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 our customers want to store. **Mr. Byladakere Somashekaraiah used S3 in combination with Redshift. This tool is necessary to store data efficiently to keep historical data and populate data tables** and only 2 people 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. At Amazon, we leverage these platforms to build company-wide systems. These systems are owned by the Service, Website, and Issue Management Team. **These tools will continue to allow Mr. Byladakere Somashekaraiah to organize and prioritize projects appropriately by collecting requirements and assigning prioritizations.** Only 2 people had knowledge of this tool out of a team of approximately 400 people
* Grasshopper: Grasshopper is a visual query-building interface for 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 more established tool and **Mr. Byladakere Somashekaraiah will continue to use it as a reference for the Amazon Quicksight integration with Redshift tables**. Less than 100 people had working knowledge of this tool out of a team of approximately 400 people

The above-mentioned tools are used as the framework for building the entire fabric of ecommerce for Amazon’s business worldwide. Many of Amazon’s tools are closely held secrets and some involve patented technology. The fact that Amazon’s sophisticated software development has been central to Amazon’s success is undeniable.

*The Beneficiary's knowledge is special compared to that of others in his field at Amazon, and/or in the industry.*

As detailed throughout, Mr. Byladakere Somashekaraiah acquired a unique and special skill set during his employment at Amazon-India through the mastery of highly technical and specialized proprietary tools as applied to Amazon-specific business intelligence problems. This expertise paired with deep knowledge of data modeling, business acumen and a firm grasp of Amazon’s core systems and business can only be obtained through extensive and specialized experience at an Amazon affiliate or subsidiary. Mr. Byladakere Somashekaraiah’s knowledge is therefore special compared to that of others in his field at Amazon, particularly because an exceedingly small proportion of similarly placed professionals can demonstrate a comparable expertise on the suite of specific Amazon tools mentioned above. Additionally, others in his field at Amazon lack Mr. Byladakere Somashekaraiah’s rich and extensive experience applying the data analysis /engineering functionality of those tools in the context of building and managing data transforms, dashboards and data warehousing.

It should also be noted that the knowledge possessed by Mr. Byladakere Somashekaraiah cannot be easily obtained by hiring externally from Amazon. For example, if Amazon were to hire an experienced Business Intelligence Engineer or Business Analyst from other tech companies (e.g. Google, Apple, Uber, Facebook), he/she would still require the same extensive training time as any new Amazon hire to attain the same level of knowledge as Mr. Byladakere Somashekaraiah. The reason for this is that these external employees may understand the same data and development concepts, but they would not have any experience on any of the key proprietary tooling necessary to perform the role, nor would they have any Amazon institutional/organizational knowledge, both of which Mr. . Byladakere Somashekaraiah has extensively cultivated during his time with the organization. Mr. Jain’s knowledge is therefore special compared to that of others in the industry.

1. **Mr. Byladakere Somashekaraiah’s L-1B petition should be approved.**

Mr. Byladakere Somashekaraiah was chosen for transfer to the U.S. because of his extensive specialized knowledge of Amazon proprietary tools. At Amazon in the U.S., **Mr. Byladakere Somashekaraiah will continue to lead the Display Advertising Finance BI team with his expertise.** ***The experience and knowledge acquired by Mr. Byladakere Somashekaraiah at Amazon-INDIA cannot be replicated, and as a result, he is considered a critical asset to the company. It would take an inordinate period to train a new hire to perform at Mr. Byladakere Somashekaraiah’s level.***

Throughout his employment with Amazon-INDIA, Mr. Byladakere Somashekaraiah was immersed in Amazon-specific and specialized proprietary tools, methodologies and processes. He has unique and considerable knowledge of Amazon proprietary frameworks. As described above, Mr. Byladakere Somashekaraiah dedicated his duties abroad to developing and utilizing Amazon proprietary tools. Indeed, very few of our employees possess Mr. Byladakere Somashekaraiah’s depth and breadth of superior and specialized knowledge. This specialized knowledge and experience will be invaluable to Amazon in the U.S.

Best Regards,

**Gayathri Shankar**

**Ops Program Manager**

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