October 4, 2016

U.S. Department of Homeland Security

USCIS California Service Center

ATTN: PREMIUM PROCESSING UNIT

24000 Avila Road, 2nd Floor, Room 2312

Laguna Niguel, CA 92677

**L-1B Visa Petition of Amazon Corporate LLC, a wholly-owned subsidiary of Amazon.com Inc. on behalf of Mr. Sharath BYLADAKERE SOMASHEKARAIAH.**

Petitioner: Amazon Corporate LLC

Beneficiary: BYLADAKERE SOMASHEKARAIAH, Sharath

Work Location: Seattle, Washington

U.S. Position: Business Analyst I

Period Requested: October 10, 2016 until October 9, 2019

Dear Sir or Madam:

Amazon Corporate LLC, (hereafter “Amazon-U.S.”), a wholly-owned subsidiary of Amazon.com, Inc., submits this letter in support of its petition for L-1B nonimmigrant status for Mr. Sharath Byladakere Somashekaraiah so that he may serve in the specialized knowledge position of Business Analyst I at our facility in Seattle, Washington for a temporary period of three years, subject to our standard employment at-will policy. Mr. Byladakere Somashekaraiah qualifies for L-1B status because he has gained significant specialized knowledge through his employment as a Business Analyst with Amazon Development Center India Bangalore (“Amazon-India”) without interruption since September 2012, and most recently in the specialized knowledge position of Business Analyst. Please see below for details on the specialized nature of his work. Amazon-U.S. and Amazon-India are affiliates; they are both wholly-owned subsidiaries of Amazon.com, Inc., and are listed as qualifying organizations on Amazon’s approved Blanket L petition. For his services, Mr. Byladakere Somashekaraiah will receive a yearly salary of $64,000 plus standard corporate benefits.

**BACKGROUND**

Amazon.com, a Fortune 100 company based in Seattle, Washington, opened its virtual doors on the World Wide Web in July 1995, and today offers Earth's Biggest Selection. Amazon.com seeks to be the world's most customer-centric company, where customers can find and discover anything they might want to buy online. Amazon.com and sellers list millions of unique new and used items in categories such as digital media, electronics, computers, kitchen products and housewares, books, music, DVDs, videos, camera and photo items, toys, baby and baby registry, software, computer and video games, cell phones and service, tools and hardware, travel services, magazine subscriptions and outdoor living items. Amazon.com also designs, manufactures, markets, and sells a wireless e-reading device called Amazon Kindle. Through Amazon Marketplace, any business or individual can sell virtually anything to Amazon.com’s millions of customers, and with Amazon.com Payments, sellers can accept credit card transactions, avoiding the hassles of offline payments. Through December 31, 2015 the company employed approximately 230,800 employees worldwide, with gross profit of $35 billion, and net sales of $107 billion.

Amazon Corporate LLC acts as a common employer and payroll facilitation company for the Amazon.com group of companies. Amazon Corporate LLC has a separate Federal Employer Identification Number, is a wholly owned subsidiary of Amazon.com and is fully integrated into the Amazon.com group of companies. It is funded entirely by inter-company advances, giving it sufficient resources to pay the wages of all of its employees. A copy of Amazon.com’s latest Annual Report and 10K is attached.

**MR. BYLADAKERE SOMASHEKARAIAH IS ELIGIBLE FOR L-1B NONIMMIGRANT STATUS**

Mr. Byladakere Somashekaraiah meets all of the eligibility criteria for classification as a specialized knowledge worker. Amazon-India, Mr. Byladakere Somashekaraiah’s employer abroad since September 2012, and Amazon-U.S., are qualifying organizations, and Amazon-U.S. is offering Mr. Byladakere Somashekaraiah a position that requires the specialized knowledge gained during his employment with Amazon-India.

* 1. AMAZON-U.S. AND AMAZON-INDIA ARE QUALIFYING ORGANIZATIONS

Amazon-U.S. and Mr. Byladakere Somashekaraiah’s current employer, Amazon-India are affiliated companies as defined by the Immigration and Nationality Act (INA). Amazon-U.S. and Amazon-India are both wholly-owned subsidiaries of Amazon.com, Inc., headquartered in Seattle, Washington. Please see a copy of Amazon.com, Inc.’s Blanket L Petition approved by U.S. Citizenship and Immigration Services along with their Annual Report and 10-K.

* 1. AMAZON-U.S. IS OFFERING MR. BYLADAKERE SOMASHEKARAIAH A POSITION IN A SPECIALIZED KNOWLEDGE CAPACITY

Amazon-U.S. would like to offer Mr. Byladakere Somashekaraiah the position of Business Analyst I in Seattle, Washington. The position that Mr. Byladakere Somashekaraiah will assume involves advanced, specialized knowledge of Amazon-specific proprietary tools and technologies. **Mr. Byladakere Somashekaraiah will be a key employee with Amazon in the United States because he already possesses the specialized knowledge required to perform his duties, and therefore does not require any further training.** The depth of his knowledge of Amazon’s proprietary technology makes Mr. Byladakere Somashekaraiah one of the very few qualified candidates for the role. In particular, Mr. Byladakere Somashekaraiah possesses specialized knowledge in Amazon’s proprietary technologies such as: Restricted Products Classifier (“RPC”), Redshift, Extract Transform Load Manager (“ETLM”), Amazon Relational Database Services (“RDS”), Grasshopper, Simple Storage Service (“S3”), Elastic Data eXchange (“EDX”), Remedy / Simple Issue Manager (“SIM”), and Data Viewer which make him the ideal candidate for this position in the United States.

At Amazon-U.S., Mr. Byladakere Somashekaraiah will join the Amazon Restricted Products (“RP”) team. The RP team was established in 2011 with a charter to protect Amazon customers from products that are illegal, illegally marketed, unsafe, or otherwise a violation of Amazon policies. The RP team’s mission is to protect Amazon customers from purchasing products that do not comply with law or Amazon policy and to help satisfy Amazon’s regulatory obligations for these products. The RP team is responsible for building trust and goodwill with regulatory agencies, to avoid unduly limiting customer selection, and to protect Amazon’s relationship with good sellers. The entire U.S. RP team consists of 1 Director, 2 Senior Managers, 2 Product Manager II’s, 3 Risk Manager III’s, 4 Risk Manager II’s, 10 Risk Specialist I’s, and 1 Business Analyst. Mr. Byladakere Somashekaraiah will be the second business analyst supporting the team and will be the current business analyst's peer, both reporting to a Product Manager II. Mr. Byladakere Somashekaraiah will serve as the lead Business Analyst on the team, as he has the technical skills and specialized knowledge to handle the complex requirements.

1. THE BENEFICIARY POSSESSES KNOWLEDGE THAT IS PARTICULARLY BENEFICIAL TO THE EMPLOYERS COMPETITIVENESS IN THE MARKETPLACE.

Mr. Byladakere Somashekaraiah will serve as the senior Business Analyst on the RP team and will mentor the other business analyst on the team, as well as other business analysts within the organization. **He will be responsible for creating and migrating all RP data tables to Amazon’s proprietary unified Health and Safety, Sustainability, Security and Compliance (“HS3C”) Redshift Cluster, which is crucial to optimizing data querying, automation and layering business intelligence self-service tools for maintaining Amazon’s compliance with regulatory obligations and its own policies.** In particular, he will use his specialized knowledge of Amazon’s proprietary tools, technologies, and platforms such as Restricted Products Classifier, Amazon Relational Database Services, Extract Transform Load Manager, Grasshopper, Quicksight, Redshift, and VIRT Dashboard to integrate business intelligence tools with databases to build relational databases, to structure databases correctly, and to create regular reports. RP is one vertical within the HS3C organization, which is currently in the process of creating a unified proprietary database structure using Amazon Redshift. This project is in-line with an Amazon-wide initiative to move off of Oracle Data Warehouse to Amazon Redshift. Mr. Byladakere Somashekaraiah’s work on RP will directly feed into Amazon’s migration project, which will reduce operational dependencies on the Oracle Data Warehouse solution, which often has a 24-48 hour delay on data needed to drive immediate decisions from Senior Management.

Mr. Byladakere Somashekaraiah will be responsible for designing and modeling the relational databases architecture for RP using proprietary tools. He will own the end-to-end solution of building the RP portion of the HS3C Unified Redshift database from gathering requirements from stakeholders, the RP team, and the Amazon Selection Classification Systems tech team, to using Amazon specific proprietary tools to structure the databases in such a way that is scalable and efficient for RP.

The unified Redshift database is also a prerequisite for the RP Program and RP Legal teams to create scaled automated reports using specialized tools like Amazon Quicksights. Not only will the RP Program and RP Legal teams be able to self-service reports, but the unified cluster will allow these two stakeholders to expedite data analysis on high risk, regulated products. This will allow Legal and business stakeholders to understand the full financial impact on newly made policies well before implementation.

Success of this project will result in an Amazon specific scalable database structure that will allow for optimized systems usage, faster and self-service data pulls, which ultimately leads to faster data driven decisions, increased compliance with regulatory initiatives, and reduction of illegal products listed on the website for sale to customers. To complete this project one needs to have an understanding of the Amazon specific tools and especially the data source to create the data tables. Mr. Byladakere Somashekaraiah already has the specialized knowledge of the required tools and data source, the Restricted Products Classifier, to fulfill the Business Analyst I role. He will be translating the information passed from the core RPC to the RP Program data tables so that stakeholders can query and make data driven decisions efficiently to comply with federal, state, and local laws as well as Amazon policies.

1. THE BENEFICIARY’S CLAIMED SPECIALIZED KNOWLEDGE NORMALLY CAN BE GAINED ONLY THROUGH PRIOR EXPERIENCE WITH THAT EMPLOYER.

The RP team deals with illegal and regulated products, and as such, Mr. Byladakere Somashekaraiah’s specialized knowledge of the Restricted Products process is absolutely essential to the project. In order to carry out his job duties, Mr. Byladakere Somashekaraiah will rely upon his specialized knowledge of Amazon’s proprietary tools, technologies, and processes. The knowledge required for this role can only be gained through prior experience working for Amazon, as many of the tools and technologies involved are proprietary to Amazon.

Mr. Byladakere Somashekaraiah’s day-to-day responsibilities which will require him to utilize his specialized knowledge of Amazon proprietary technologies will include:

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| **Job Duty** | **Percentage of Time Allocated to each Job Duty** | **Proprietary Amazon Tool used to Complete Job Duty** |
| Owning and building relational databases for the Restricted Products team to support data queries and scaled automated reporting | 30% | S3, Redshift, ETLM, RPC Data Pipeline, VIRT, EDX |
| Integrating business intelligence tools with databases to create regular reports | 15% | Redshift, QuickSight, Grasshopper |
| Automating weekly, monthly, and quarterly reporting using a combination of SQL and business intelligence tools that can scale globally | 10% | Amazon RDS, Redshift, QuickSight, Grasshopper |
| Partnering with stakeholders to understand business challenges and providing data and analysis to help drive projects | 15% | RP Process, RP Classifier, Redshift, ETLM, Time Machine, Remedy, Data Viewer |
| Uncovering trends and correlations through data mining and analysis to drive effective decisions for the business | 10% | RP Process, RP Classifier, Redshift, ETLM, Time Machine, Remedy, Data Viewer, QuickSight |
| Working with functional leaders and other internal groups to build scalable processes and solutions | 10% | SIM, RP Process, RP Classifier |
| Communicating results to business leaders for Categories, Product Compliance, and Legal | 10% | SIM |

Mr. Byladakere Somashekaraiah possesses knowledge and experience working with a variety of Amazon internal software tools and technologies which newly hired analysts do not possess. **Having performed a similar role at Amazon-India, Mr. Byladakere Somashekaraiah already possesses advanced knowledge of the proprietary tools and technologies needed for the RP team at Amazon-U.S. He has developed in-depth knowledge of the proprietary software applications and services, while working at Amazon-India and has demonstrated an ability to establish scalable, efficient, automated processes for large scale data analyses, model development, model validation and model implementation, as well as track general business activity and provide clear, compelling management reporting on a regular basis, all of which are required for this project.** Specialized knowledge of this platform cannot be gained outside of Amazon, making him uniquely qualified for this role. His expertise will allow for an efficient and smooth transition to his role in the U.S. Mr. Byladakere Somashekaraiah’s proposed duties will require the use of the following Amazon-specific proprietary tools of which he already has expertise:

* 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 use Redshift to consolidate RP data and manage the unified database.**
* 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 use ETLM to retrieve Amazon wide legacy data load into newly data tables created in Redshift.**
* Amazon Relational Database Service (Amazon RDS): Amazon RDS is a service provider for database engines to choose from: Amazon Aurora, Oracle, Microsoft SQL Server, PostgreSQL, MySQL and MariaDB. It makes it easy to set up, operate, and scale a relational database in the Amazon Web Services (“AWS”) cloud. It provides cost-efficient and resizable capacity while managing time-consuming database administration tasks, allowing the user to focus on their applications and business. **Mr. Byladakere Somashekaraiah will migrate Amazon RDS data tables which contains RP classifier logs into newly created data tables in Redshift.**
* 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 integrate this tool with the database tables, which will provide RP data to stakeholders without the need to master SQL.**
* 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 use it as a reference for the Amazon Quicksight integration with Redshift tables.**
* VIRT Dashboard: This is a self-service tool that allows teams throughout the company to build their own tables on Amazon's Enterprise Data Warehouse. Users enjoy the benefits of high-performance, 24x7 analytics without the overhead of DBAs, worrying about hardware deployment and scaling, software patches, etc. **Mr. Byladakere Somashekaraiah will be pulling data from other teams in the organization who store their data in the VIRT dashboard into the Redshift cluster. It is imperative to have a high level understanding of this tool in order to be able to pull data efficiently and effectively.**
* 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 will use S3 in combination with EDX, Redshift, and VIRT Dashboard. This tool is necessary to store data efficiently so that the RP team can keep historical data used to populate data tables.**
* 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 within our organization. Many of our customer teams are forced to build one-off solutions adding to operational challenges, in order to effectively manage ingress and egress of bulk data across systems. 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 use EDX in combination with the VIRT Dashboard and Redshift. This tool is necessary to move data quickly and efficiently so that the RP team and stakeholders can view all necessary data in once source.**
* Data Viewer: This tool allows the user to deep dive catalog records (in Item Master) including attributes, relationships, merchant/SKU/item mappings, reconciliation, and submission history for merchant ID/SKU, gating decisions, and prices for a merchant ID/SKU. **Mr. Byladakere Somashekaraiah will utilize this tool to look at upstream data that affects RP.**
* Time Machine: For an item, also known as, Amazon Standard Identification Number (“ASIN”)**,** Time Machine will indicate when an attribute was changed. It currently indexes items, listings, and merchant contributions. **Mr. Byladakere Somashekaraiah will use this tool to deep dive into the history of ASINs. His knowledge of this tool will allow him to create a scalable solution, pulling Time Machine data into a Redshift data table so that the RP team can look at ASIN attribute information in bulk.**
* 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 allow Mr. Byladakere Somashekaraiah to organize and prioritize projects appropriately by collecting requirements and assigning prioritizations.**
* Restricted Products Classifier (RPC): Amazon uses an automated, keyword-based tool called the Restricted Products Classifier to identify and action prohibited, restricted, and regulated products. The tool classifies all new or changed ASINs every two to five minutes and is owned by the Amazon Selection Classification System team. This tool is the main tool that drives compliance with laws and regulation by taking down ASINs from the Amazon website so that they are not available for sale to our customers. Knowledge of how this tool works lies within the RP team and appropriate stakeholders. **Mr. Byladakere Somashekaraiah already has a deep understanding of how the system works and of the tools and processes that feed into it to drive actions on prohibited, restricted, and regulated products.**

Experience in these tools and systems cannot be gained outside of Amazon, and Mr. Byladakere Somashekaraiah will bring nearly 4 years of experience to his new role at Amazon-US.

1. THE BENEFICIARY POSSESSES KNOWLEDGE OF FOREIGN OPERATING CONDITIONS THAT IS OF SIGNIFICANT VALUE TO THE PETITIONING ORGANIZATIONS U.S. OPERATIONS.

Mr. Byladakere Somashekaraiah will use his specialize knowledge of Amazon’s proprietary tools and technologies, in particular his knowledge of RP, on the following projects in the U.S.:

* HS3C data cluster unification, Restricted Products - Amazon as a whole is migrating off of Oracle Data Warehouse to its in-house Redshift Data Warehousing solution. This project is part of a company-wide initiative to move all data to the in-house solution as it is scalable, faster, and cheaper for Amazon. Mr. Byladakere Somashekaraiah will be responsible for designing, architecting, and building relational databases, which need to be piped from Amazon's proprietary RPC tool. He will own the end-to-end technical project of creating databases from scratch for the RP team using proprietary tools like Redshift, VIRT Dashboard, ETLM, S3, and EDX. He will work directly with the Amazon Selection Classification System (ASCS) engineering team to ensure that data from the RPC is properly structured to fit business and legal needs. This project will scale data analysis to drive faster business and legal decisions as well as to support data queries and automated reporting. Success of this project will result in faster data driven decisions, increased compliance with regulatory initiatives, and reduction of illegal products listed on the website for sale to customers.
* Integration of a Business Intelligence (BI) tool on the HS3C data cluster - The BI tool will allow non-technical stakeholders to access proprietary data efficiently and make fast data driven decisions without the need of a SQL expert. Self-service tools scale rather than having to be dependent on another person to get data. Mr. Byladakere Somashekaraiah will be responsible for integrating the new database structure from the HS3C data cluster unification project to a BI tool like Quicksights. The success of this project will result in the RP team, business, and legal stakeholders to self-service data without having to master SQL. This gives stakeholders flexibility to create their own reports for their business needs with RP data.
* Detailed data analysis on a proprietary tool's auto-review algorithm to drive enhanced tool functionality - Increasing auto-classification allows RP to continue to grow at the pace Amazon is growing at without adding incremental headcount to support classification. A machine with the right algorithm can reduce the number of people who manually review items as the business continues to grow. Mr. Byladakere Somashekaraiah will conduct detailed data analysis on the RPC auto-classification algorithm to drive an increased auto-classification rate. **Knowledge of this algorithm is proprietary to Amazon and is only shared with select members of the RP team. Mr. Byladakere Somashekaraiah’s previous role required this knowledge, thus he already knows the end-to-end workflow of the RPC tool, allowing him to perform this analysis and work closely with the ASCS engineering team to drive functionality to meet his requirements.** Success of this project will result in the RPC tool scaling with the growth of the Amazon business and reduction in the need for manual review. This is also in-line with a 2016 RP Goal to increase automation to 50%.
* Reducing Amazon's legal risk of selling illegal products to customers by overhauling the false negative program - Amazon is obligated to comply with all laws and to protect Amazon customers from products that are illegal, illegally marketed, unsafe or otherwise in violation of our policies. As the Amazon business grows, it is necessary to ensure that the risk for selling illegal items does not grow as well. Overhauling the RP false negative program will increase compliance to regulatory initiatives, reducing overall risk to Amazon. Mr. Byladakere Somashekaraiah will partner with stakeholders to reduce Amazon's legal risk of selling illegal products. Specifically, he will be working to overhaul the RP false negative program. He will work with the engineering team to understand the functionality of the new RP Audit tool in order to architect and build new databases to support the tool. He will partner with legal, program, and engineering stakeholders to build an algorithm based on historical data as well as program requirements that will automate audit cadences based on product risk level to drive down false negative rates and Amazon's exposure to selling illegal products on the website. Mr. Byladakere Somashekaraiah will use the **RP Classifier, Redshift, ETLM, VIRT Dashboard, Data Viewer,** **and RP Audit tool to build this algorithm.** Success of this project will result in exceeding a 2016 RP goal to create a tool to automate audits at a regular cadence. This regular cadence will be determined using the database Mr. Byladakere Somashekaraiah will be building for the Audit tool.
* Expediting Amazon’s cross border businesses by developing a self-service compliance risk model that will reduce a three month lead time per source-destination country arc to less than a month - Amazon is rapidly expanding its cross-border businesses in 2016/2017. Creating this risk model will allow Amazon to continue to scale while being compliant in the new businesses. Mr. Byladakere Somashekaraiah will partner with stakeholders in other Amazon verticals (e.g. Customer Service, Transportation, Ordering, Check Out, Exports, etc.) to obtain data sources that can be fed into new database structures, which will serve as the prerequisite for a cross-border risk model. He will work with Data Engineers across Amazon to bring data from their databases into newly built data tables. He will partner with legal, program, business, engineering, and data scientist stakeholders to build a robust algorithm that will automate decision making of new cross border initiatives. **He will use proprietary tools such as ETLM, VIRT Dashboard, Redshift, RDS, and S3 to integrate different sources of data stored in local databases or CSV files across multiple Amazon business verticals into one database. He will then create an algorithm based on the data output using Excel and integrate the data into Amazon Quicksights to display the output to stakeholders.** Success of this project will result in reducing an aggregated 2.5 year lead time for 17 new business opportunities to less than a year. Stakeholders will be able to drive decisions with basic inputs like source and destination country, rather than a manual process that is not dictated by data.

Mr. Byladakere Somashekaraiah’s experience and specialized knowledge acquired over the last four at Amazon-India makes him uniquely qualified to lead the projects of the RP team. His experience utilizing these tools, systems, and processes cannot be obtained outside of Amazon. It is estimated that hiring someone in the U.S. would take twelve to eighteen months to ramp up to fully understand all systems. This lead time will increase the risk of exposing Amazon customers to products that do not comply with the law. Mr. Byladakere Somashekaraiah has expert knowledge of the above referenced technologies and systems and it is extremely difficult to gain such expertise, even within Amazon. Additionally, Mr. Byladakere Somashekaraiah has demonstrated strong performance and ability with these tools and technologies, far exceeding that of his peers. The knowledge and experience associated with utilizing these technologies solidify him as the ideal candidate to lead this crucial project here in the United States. He is already a Business Analyst on the Compliance Operations team at Amazon-India, and the job duties in the U.S. are essentially the same.

* 1. MR. BYLADAKERE SOMASHEKARAIAH HAS GAINED CRITICAL SPECIALIZED KNOWLEDGE EXPERIENCE WORKING FOR AMAZON-INDIA

Mr. Byladakere Somashekaraiah joined Amazon-India in September 2012 as a Catalog Associate. He has since been promoted to Subject Matter Expert I (October 2013), Subject Matter Expert II (April 2015), and Business Analyst (November 2015), and is still employed in this position. While employed with our company in India, Mr. Byladakere Somashekaraiah has gained extensive and specialized knowledge of Amazon’s proprietary tools, methodologies and processes.

1. THE BENEFICIARY HAS BEEN EMPLOYED ABROAD IN A CAPACITY INVOLVING ASSIGNMENTS THAT HAVE SIGNIFICANTLY ENHANCED THE EMPLOYER’S PRODUCTIVITY, COMPETITIVENESS, IMAGE, OR FINANCIAL POSITION.

At Amazon-India, Mr. Byladakere Somashekaraiah is part of the Compliance Operations (“COPs”) team, a sister team that supports RP and multiple HS3C programs. The COPs team consists of approximately 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 is the senior Business Analyst of the COPs team; he owns the complete data domain for COPs and will be building out a similar complex domain for RP in the U.S. to serve the legal and business requirements**. His main responsibilities are building relational databases as part of the COPs vertical of the HS3C Unified Redshift Data Cluster. He currently supports RP as it is one of the programs supported by the COPs team. Thus he already has specialized knowledge of the RP program, which he will utilize while working on the RP team in the U.S. He has also previously built 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. These skills directly transfer to the needs of RP.

The COPs team, is comprised of four (4) main processes and twelve (12) sub-processes with a capacity of approximately 400 employees across India, Romania, China, and Poland. Mr. Byladakere Somashekaraiah is the longest tenured Business Analyst on the team, which had just been separated from core Retail Business Service team. When he joined, there were minimal Key Performance Indicators (“KPIs”) to measure the health of the team. There was little to no documentation on data sources and processes. In addition, all business users had to pull all of the data manually as automated dashboards did not exist. **Mr. Byladakere Somashekaraiah took the initiative to gather requirements from Compliance Operations supported across the world and started working with cross-functional teams (business, legal, and tech) to design and build a worldwide automated dashboard**. **He understood the various aspects of data modeling, used multiple Amazon specific tools and technologies like Redshift, ETLM, Grasshopper, and VIRT to build an automated dashboard which helped the business users to easily navigate and monitor key metrics. This helped save a significant amount of time for his team as they no longer needed to pull these KPIs manually.**

In addition, as the team expanded, Mr. Byladakere Somashekaraiah recommended that a Business Analyst sit locally in each region to better support each of the local operations and business teams. He mentored the new Business Analysts in the different regions with the necessary tools and shared best practices with them, which helped them ramp up quickly.

Along with building a dashboard to address the various requests related to the metrics from leadership, Mr. Byladakere Somashekaraiah has worked with respective managers and provided collaboratively shaped solutions. For example, leadership wanted to be more proactive to meet their KPI goal for service level agreements (SLA) rather than reactive to the KPIs. **Mr. Byladakere Somashekaraiah identified the root causes of the miss in goals, and provided necessary measures to avoid missing SLAs like identifying the transaction before it misses. This helped leadership prioritize the work properly.**

Since Compliance Operations was a newly formed team, Mr. Byladakere Somashekaraiah created a SharePoint solution to store, maintain, and collaborate all business documents, internal tasks, hiring details, projects and polices. He also managed the Internal Quality program by building a robust Java based tool with the tech team to serve all the operational needs. He is also Six Sigma Black Belt trained, which helps in project execution and process excellence. His unique skills has allowed him to partner on multiple high impact process improvement projects along with his core responsibilities as a business analyst.

In his four years of tenure with Amazon-India, Mr. Byladakere Somashekaraiah has saved the equivalent of fifteen (15) full time employees worth of work due to his various automations and process improvement projects. In addition, he has participated in the 2017 Operational Planning, supporting a brand new process to plan for variable expenses (estimated to be $8.1MM) and headcount models for Compliance Operations. This ensures that support functions are prepared to handle the increase in volumes efficiently in 2017. Working on Operational Planning includes working with all of the teams Compliance Operations supports within the HS3C organization and communicating results to stakeholders that include Senior Managers and Directors.

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. His extensive experience in the tools and expertise of RP process will be highly beneficial to the U.S. team. Mr. Byladakere Somashekaraiah’s specialized knowledge duties at Amazon-India are similar to his proposed duties at Amazon-U.S., and include:

* Defining Management Information reporting requirements and compliance related dashboards to enable an integrated approach covering all compliance topics;
* Building a compliance organization level reporting dashboard to help management understand challenges and risks faced around compliance;
* Understanding requirements from the leadership and product compliance teams and mapping them with data sources / data warehouse;
* Guiding and mentoring analysts to create next future analysts;
* Executing high priority (i.e. cross functional, high impact) projects to improve operations performance with the help of analytics managers;
* Planning resourcing, analyzing and reporting daily, weekly and monthly metrics; identifying trends and opportunities to reduce costs and improve processes; and
* Partnering with stakeholders and be a part of the solution process, to potentially minimize revenue impacts owing to compliance actions.

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| **Job Duty** | **Percentage of Time Allocated to each Job Duty** | **Proprietary Amazon Tool used to Complete Job Duty** |
| Defining Management Information reporting requirements and compliance related dashboards to enable an integrated approach covering all compliance topics; | 20% | S3, Redshift, ETLM, VIRT Dashboard |
| Building a compliance organization level reporting dashboard to help management understand challenges and risks faced around compliance; | 10% | S3, Redshift, ETLM, VIRT Dashboard |
| Understanding requirements from the leadership and product compliance teams and mapping them with data sources / data warehouse; | 15% | Redshift, ETLM, VIRT Dashboard |
| Guiding and mentoring analysts to create next future analysts; | 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; | 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; and | 20% | Redshift, ETLM, VIRT Dashboard |
| Partnering with stakeholders and be a part of the solution process, to potentially minimize revenue impacts owing to compliance actions. | 15% | Redshift, ETLM, VIRT Dashboard, S3 |

Mr. Byladakere Somashekaraiah has gained expertise with all of the previously mentioned proprietary technologies, including Grasshopper, Redshift, ETLM, VIRT Dashboard, among others. He has advanced experience using Amazon’s proprietary technologies in the following ways:

* **Mr. Byladakere Somashekaraiah has utilized his expertise in Redshift, 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 significant amount of time for his team as they no longer needed to pull this data manually. 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.
* **Mr. Byladakere Somashekaraiah has 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 ETLM 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 RP 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. These skills directly transfer to the needs of the RP team.

1. THE BENEFICIARY POSSESSES KNOWLEDGE OF A PRODUCT OR PROCESS THAT CANNOT BE EALISY TRANSFERRED OR TAUGHT TO ANOTHER INDIVIDUAL WITHOUT SIGNIFICANT ECONOMIC COST OR INCONVENIENCE.

Mr. Byladakere Somashekaraiah has taken trainings on Amazon Advance SQL, ETLM, VIRT, Grasshopper, Amazon Advance Excel, Amazon BI Metadata, Redshift, and Using Tableau Desktop with Redshift. These trainings have helped him in writing more efficient SQL codes to align with the Amazon Data Warehouse standards. They also have provided details on troubleshooting errors within Amazon Data Warehouse which is pivotal for a Business Analyst to learn. This has allowed him to share best practices and be a mentor as a Senior Business Analyst to more junior members of his team.

Mr. Byladakere Somashekaraiah’s outstanding performance has been awarded as evidenced by his numerous promotions 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 for Amazon’s U.S. team. He has been identified as a key employee for transfer because **he was the first Business Analyst on the COPs team and he already supports RP indirectly, which is crucial to the projects that the RP team work on.** 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. His extensive experience in the tools the RP team uses is essential to the U.S. team. It is estimated that hiring someone in the U.S. would take at least twelve to eighteen months to ramp up to fully understand all systems. This lead time will increase the risk of exposing Amazon customers to products that do not comply with the law.

**Hiring someone in the U.S. would take at least twelve to eighteen months to ramp up because a business analyst initially needs to understand all of the Amazon proprietary tools required for projects, which itself takes three to four months to have only an intermediate level of understanding. Once a business analyst understands the tools, s/he will need to understand the existing Amazon-wide data tables at a granular level—how the data is stored, how data tables interact with each other, which data represents what. S/he will also need to understand the different data sources available like ETLM, Redshift, VIRT Dashboard, RDS, S3, etc. which takes another 4 to 5 months. A newly hired business analyst will also need to understand the RP process and its complex data tables and data inputs, which is an additional three months of onboarding. In addition, one needs to have advance skills in SQL coding, HTML, Excel, VBA, and hands on experience building complex queries, building databases and dashboards, troubleshooting errors and exception handling, and have a deep understanding of the overall Amazon business to presents the data in Amazon standards, which requires 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.

**AMAZON-U.S.’S L-1B NONIMMIGRANT PETITION ON BEHALF OF MR. BYLADAKERE SOMASHEKARAIAH SHOULD BE APPROVED**

Amazon-U.S.’s L-1B Nonimmigrant Visa Petition on behalf of Mr. Byladakere Somashekaraiah should be approved. As affiliates, Amazon-U.S. and Amazon-India are qualifying organizations. Further, the Business Analyst I position that Amazon-U.S. offers is a key specialized knowledge position, and Mr. Byladakere Somashekaraiah is uniquely qualified to serve in this position by virtue of his extensive knowledge and experience with Amazon proprietary technologies, tools, processes and services. **Based upon the totality of the circumstances and upon the preponderance of the evidence, the request for the Beneficiary’s L-1B nonimmigrant status should be approved.** Therefore, we respectfully request your favorable adjudication of this petition. Upon approval, Amazon-U.S. will offer Mr. Byladakere Somashekaraiah temporary employment as Business Analyst I, at an annual salary of $64,000 plus standard company benefits.

Thank you for your kind attention to this matter.

Very truly yours,

Jeremiah Stankus / Andrea Grenier-Geslain / Allison Wilson / Brenna Maros / Aliza Goldstein

Immigration Specialist