

**UNITED STATES DEPARTMENT OF LABOR
OFFICE OF ADMINISTRATIVE LAW JUDGES**

OFFICE OF FEDERAL CONTRACT
COMPLIANCE PROGRAMS, UNITED
STATES DEPARTMENT OF LABOR,

Plaintiff,

v.

ORACLE AMERICA, INC.,

Defendant.

OALJ Case No. 2017-OFC-00006

OFCCP No. R00192699

**DECLARATION OF CHANDNA
TALLURI IN SUPPORT OF
DEFENDANT ORACLE
AMERICA, INC.'S MOTION FOR
SUMMARY JUDGMENT OR, IN
THE ALTERNATIVE, FOR
PARTIAL SUMMARY
JUDGMENT**

REDACTED PURSUANT TO COURT ORDER

I, Chandna Talluri, hereby declare as follows:

1. I make this declaration in support of Oracle America, Inc. (“Oracle”)’s motion for summary judgment or, in the alternative, for partial summary judgment. I have personal knowledge of the matters contained in this declaration. If called to testify to the information in this declaration, I could do so competently.

2. I know that I am one of the employees whose compensation is at issue in this lawsuit. I understand that the attorneys who interviewed me and assisted in preparing this declaration for me represent Oracle and do not represent me. Before signing this declaration, I read it carefully to make sure it was accurate, and it is. I was not pressured or required to sign this declaration. I am providing this declaration voluntarily.

3. I am a female and a current Oracle employee. I work in the Information Technology job function and my system job title is IT Director. However, my role is better described under my discretionary job title, which is Director, OALQA. OALQA stands for Oracle Applications Lab, Quality Assurance. My job code is 75040 and my career level is M4. I work in the line of business led by Steven Miranda, Executive Vice President of Oracle Applications Product Development. I am based in Oracle’s California headquarters.

4. I joined Oracle in February 2017 as a Senior Manager of OALQA. I was promoted to Director approximately one year ago. Prior to joining Oracle, I worked at a financial services company, CashEdge, now called Fiserv. I joined Oracle because the application I was working with at CashEdge was not faring well in the market, I did not feel challenged in my role, and I saw more opportunities at Oracle.

5. Since I joined Oracle, I have been primarily responsible for a product called Oracle Configure, Price, and Quote Cloud, or CPQ. This product is part of a cloud-based technology called Oracle Application Labs that implements, maintains, and upgrades various products used internally within Oracle. CPQ is an application that offers a comprehensive tool for Oracle’s sales representatives and business teams to perform and track their work. It allows the sales team to look for potential buyers, generate and track potential sales opportunities, create

quotes for customers with pricing and other information, follow-up with customers, and has many other functionalities related to sales. The version of CPQ that my team handles is used primarily by Oracle's internal sales and business teams. A separate Oracle team handles the version of CPQ that is available externally to customers.

6. My team is comprised of approximately twenty-one people and is spread across the U.S., India, and Mexico. I have seven direct reports, two of whom are based in Oracle's California headquarters. My team is called the CPQ Center of Excellence for Testing (COE). We conduct testing and quality assurance, which means that we test technical changes and updates to CPQ before they are put into production, and ensure that all changes function properly.

7. This process involves functional testing and automation testing, and I manage two teams dedicated to each type of testing. Functional testing refers to manual testing, which requires a deep understanding of the application and how it works. CPQ is an application that uses and interacts with many other products and systems to do its job, such as customer management and validation systems, order management systems, and others. Functional engineers must understand how CPQ interacts with these systems and find ways to test and improve its functionality. To do so, they login as the end users and test CPQ for processes like creating ordering documents, price quotations, customer validation, proper calibration of taxes based on the customer's location, and many other aspects of CPQ's functionality. They use their knowledge of the application's ins and outs to generate comprehensive test cases and ensure that the application is tested thoroughly enough before it is released to customers. To do so, functional engineers do not need extensive coding expertise.

8. On the other hand, automation engineers are coding experts. Automation refers to the process of automating certain testing so that multiple scenarios can be tested faster (or even simultaneously), at any time of day or night, and more efficiently without the need for human oversight. To this end, the automation teams works closely with developers, who assist with coding and developing scripts. My expectations for automation engineers are that they know and

understand automation tools, such as Java, Python, or Selenium, so that they can develop scripts (*i.e.* write code) which properly mimics the end user. Using the above example, an automation engineer would write code that automatically tests an improper login and whether tax is calibrated correctly based on the customer's location. The automation engineers do not need extensive knowledge of the application's functionality because they need to write code according to a test case, which identifies all the steps that must be coded (*e.g.*, Step 1: login; Step 2: make sure login is successful, etc.). They must also determine the timing and scope of automation for every given step. Finally, they need to capture the results and present them in a coherent way, such as which tests failed and which were successful and why. To perform these tasks for CPQ, automation engineers need significant coding expertise.

9. My role is to manage my functional and automation teams to ensure that CPQ's monthly releases occur on time. A release refers to new code that gets added to the application either to fix, enhance, or improve its functionality. My position in quality assurance requires me and my team to fully understand the changes and the new functionality for the product. For the functional team, a big part of my role is determining the type and scope of testing and ensuring that my team has enough resources to complete it in a timely manner. For the automation team, my role includes generating and managing the roadmap for automation and developing priorities for which testing should be automated first.

10. Some of the engineers I manage on these teams have overlapping job codes, but their roles are entirely different depending on whether they perform functional or automation testing. For example, I supervise two IT Managers (job code 75020), one on the functional team and the other on the automation team, who have completely different skillsets. One of the managers supervises the functional team for manual testing activities. Her expertise is in the functionality of the product and how the application behaves, and she understands the ins and outs of the CPQ application better than anyone else. However, she does not perform automation testing and does not know the coding behind the application. The other IT Manager I supervise works on the automation testing team for CPQ. He has sound knowledge in coding and comes

up with the frameworks needed to automate test cases, but he is not functionally strong because his role is not centered on understanding the functionality of the application. Their roles are complementary in the sense that they are two sides of the same coin, and both are needed to ensure that CPQ operates at the highest level for our customers. However, their skillsets are not interchangeable.

11. Similarly, I have four colleagues at my director level within OALQA—three in Oracle’s headquarters office and one in India—who share my job code but have different roles and responsibilities. Whereas I manage the functional and automation teams for CPQ, my colleagues manage Oracle’s Cloud Framework and Oracle Fusion Applications, such as Enterprise Resource Planning (ERP), Sales Cloud, and Supply Chain. These applications are functionality different. Since we have a mix of expertise and manage different products, I do not believe that we can step into each other’s roles without a significant amount of training and on-the-job experience.

12. For example, [REDACTED] has the same system job title as me and also works at Oracle’s California headquarters. We are in the same QA organization, but [REDACTED] works on Fusion Applications like ERP, Sales Cloud, and Supply Chain. Like me, [REDACTED] and her team also perform release testing, but the components and functionalities of our applications are very different, so their testing requires different technical knowledge and skills. For instance, CPQ allows Oracle’s sales teams to maximize deal profitability by optimizing pricing and creating dynamic proposals, contracts, and other sales items, while Fusion Applications have a broader scope and use different systems to function. Fusion Applications could be used by human resources or individual employees to create expense reports, offer human capital management, financial management, and other functions.

13. I know which points of integration require testing in CPQ, but these points are different in Fusion Applications. Integration refers to systems that must work together to perform a single role. For example, a customer’s contact information lives in one application, and the tax that customer must pay based on their geographic location is stored on another

system. These applications must be integrated in order to generate a customer's price quote or receipt within CPQ. The systems that must be integrated for Fusion Applications are completely different than for CPQ. For example, if human resources is creating an expense report, the system must determine the category of the reports (*e.g.* meal versus travel reimbursement), the approval hierarchy for the expense, and the employee's bank account for receiving the reimbursement. I do not know which systems must work together to make those applications perform properly because our underlying technical knowledge for our respective products does not translate to one another. For these reasons, if I had to step into [REDACTED] shoes, I would require extensive training to obtain her level of expertise in Fusion Applications and vice versa.

14. As a manager, I am involved in hiring. Typically, my team aims to hire at the IC3 career level, but on rare occasions we may hire an IC2 or IC4, depending on the candidate's particular experience. I work closely with Oracle's recruiting agent, who advertises the position and conducts the initial screening based on my needs for the position. Then, candidates go through a formal interview process, with approximately four interviews per candidate. I discuss the finalists with my manager and we evaluate the candidate's potential contribution and our team's overall needs. Once I select a candidate, I work with an HR Business Partner dedicated to OAL to determine the market rate for the position based on the candidate's background. I determine starting salary mainly by looking at prior experience. I have never relied on prior pay as part of the decision-making process – I focus exclusively on a candidate's merits. I also have never considered race or gender in my hiring or compensation decisions. My hiring decisions and starting pay determinations have never been overturned.

15. Several factors make a candidate's resume stand out to me, depending on whether I am hiring for my functional or automation teams. For the functional team, any background in Oracle applications stands out because it makes the candidate's transition to my team more seamless because he or she should be able to quickly learn CPQ's functionality. A testing background is also useful, and I evaluate how readily a candidate can test applications, their depth of understanding of how applications function in the cloud, and their knowledge of the

database. For the automation team, I look for more technical skills, such as experience with Java, the candidate's coding proficiency, whether the candidate ever developed automated testing for an application, and the like. Finally, I consider non-technical factors for both teams, such as a candidate's attitude, the type of challenges I think they can take on, and how well they work with the other members of my team.

16. I participate in determining compensation increases, including focal, bonus, and equity distributions. Although I do not determine the percentage allotted to each person, I rank my direct reports and provide recommendations to my supervisor. I base my ranking decisions on my direct reports' quality of work and how it comports with the overall expectations of their roles. I always consider whether someone has gone the extra mile and reward the individuals who are consistently reliable in their performance. For example, during the last focal process, I evaluated all of my direct reports. For my direct reports on the automation team, I considered the quality of the coding frameworks they developed and how well they used that framework on the team – meaning, whether they were available to the team to provide training and answer questions. For my direct reports on the functional team, I evaluated how well they knew the application. Those that knew that application inside and out stood out to me; for example, if someone came up with good test cases and was proactive in identifying issues for a release early on. I also consider pay equity for my direct reports. My ranking decisions have never been overturned, but on occasion my supervisor has asked me to provide justifications for the rankings. I have transparent conversations with my supervisor on this subject and I feel that he values my recommendations. Race and gender have never played a role in the ranking of my direct reports.

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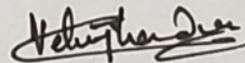
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17. I have not seen or experienced any bias based on gender or race during my time at Oracle, and I do not believe that my race or gender has played a role in my compensation or career development at Oracle. I attend Oracle's mandatory annual non-discrimination trainings, pay attention to HR guidance regarding compensation and hiring decisions, and have regular discussions with my manager about the dos and don'ts for my team.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Redwood City, California, on 09/18, 2019.



Chandna Talluri