

**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.

Case No. 2017-OFC-00006

**DECLARATION OF HEA JUNG ATKINS IN SUPPORT OF OFCCP'S MOTION FOR
SUMMARY JUDGMENT**

I, Hea Jung Atkins, state and declare as follows:

1. I am a Director of Planning and Support for the Office of Federal Contract Compliance Programs. I submit this declaration in support of OFCCP's Motion for Summary Judgment. I have personal knowledge of the matter set forth in this declaration, and I could and would competently testify thereto if called upon to do so.

2. On October 16, 2019, I created two tables in an excel spreadsheet using data from an excel spreadsheet bates stamped ORACLE_HQCA_0000003616 ("spreadsheet 3616"). This spreadsheet is a "2014 snapshot" that Oracle created during OFCCP's investigation. Paragraphs 3 through 7 below describe the steps I took to create these tables. A true and correct copy of these two tables are attached to this declaration as Exhibits A and B.

3. Using the original data table from spreadsheet 3616, I sorted all of the data first by "Job Function" (column H), then by "Job Specialty" (column I) and then by "Job Title"

(column G). I then deleted any row that did not contain the Job Function terms “INFTECH” “PRODEV” or “SUPP” and I hid from view all but the following columns: G-I, P (“Grade”), and Z (“Global Career Level”). I copied and pasted all of the remaining data rows into a new excel spreadsheet and created the table, titled “HQCA Analysis of Product Development, Information Technology, and Support Job Functions by Job Function” (hereinafter “Table 1” at Exhibit A). Column H in spreadsheet 3616 became column A; column I in spreadsheet 3613 became column B; column G in spreadsheet 3616 became column C; column Z in spreadsheet 3616 became column D; and column P in spreadsheet 3616 became column E. I then relabeled my column headings in Table 1 based on the corresponding information contained within the columns.

4. Next, I created column F, titled “# of Employees Within Job Title” and tallied how many Oracle employees were in each job title. I entered this number into column F for each corresponding job title in the last row of the job title and deleted all rows of the job title that did not contain this total.

5. I then examined the salary grade (column E) in each row and highlighted each salary grade and its corresponding job title (column C) and global career level (column D) with a different color, such that all salary grades that were the same were highlighted with the same color.

6. I created the second table, titled “Oracle HQCA Analysis of Product Development, Information Technology, and Support Job Functions, Job Specialties and Systems Job Titles by Global Career Levels and Salary Grades” (hereinafter “Table 2” at Exhibit B) by copying and pasting all of the data from Table 1 into Table 2. I then sorted the Table 2 data by “Salary Grade by Job Title” (column L). I organized column L such that all of the “E” salary grades were listed first, and were arranged numerically from lowest to highest, and then I listed the “N” salary grades, also in numeric order.

7. Next, I created column N, titled “Total # of Employees in Salary Grade.” I calculated the number of employees in each salary grade and put the total under column N. I

then created column O, titled "Total # of Titles in Salary Grade." I calculated the total number of different job titles within each salary grade, and listed this number under column O.

8. Upon examining Table 2, I saw that Salary grade E.09 contained seventeen different job titles and three different job functions.
9. Salary grade N.10 contained nine different job titles and two different job functions.
10. Salary grade E.11 contained fourteen different job titles and three different job functions
11. Salary grade E.12 contained twelve different job titles and three different job functions
12. Salary grade E.10 contained twelve different job titles and two different job functions.
13. Salary grade E.14 contained eight different job titles and three different job functions.
14. Salary grade N.12 contained eight different job titles and three different job functions.
15. Salary grade E.06 contained seven different job titles.
16. Salary grade E.07 contained seven different job titles and three different job functions.
17. Salary grade E.08 contained seven different job titles and two different job functions.
18. Salary grade N.07 contained seven different job titles and two different job functions.
19. Salary grade N.14 contained seven different job titles and three different job functions.
20. Salary grade E.13 contained six different job titles and two different job functions.

21. Salary grade N.13 contained six different job titles and three different job functions.

I declare under the penalty of perjury that the foregoing is true and correct and that this declaration was executed in San Francisco, California on October 16, 2019.


HEA JUNG ATKINS
Director of Planning and Support

	A	B	C	D	E	F
1	HQCA Analysis of Product Development, Information Technology and Support Job Functions by Job Function					
2						
3	Job Function	Job Specialty	Jobs Titles Within Job Specialties	Global Career Levels by Job Title	Salary Grade by Job Title	# of Employees Within Job
4	INFTECH	BUSIMP		IC3		
5	INFTECH	BUSIMP		IC4		
6	INFTECH	BUSIMP		IC5		
7	INFTECH	BUSIMP		M2		
8	INFTECH	DCS		IC0		
9	INFTECH	DCS		IC2		
10	INFTECH	DCS		IC3		
11	INFTECH	DCS		IC4		
12	INFTECH	DCS		IC5		
13	INFTECH	DCS		IC2		
14	INFTECH	DCS		IC3		
15	INFTECH	DCS		IC4		
16	INFTECH	DCS		IC5		
17	INFTECH	DCS		IC2		
18	INFTECH	DCS		IC4		
19	INFTECH	EUSUPP		IC2		
20	INFTECH	EUSUPP		IC3		
21	INFTECH	EUSUPP		IC4		
22	INFTECH	FUNC		IC2		
23	INFTECH	FUNC		IC3		
24	INFTECH	FUNC		IC4		
25	INFTECH	FUNC		IC5		
26	INFTECH	GENIT		M4		
27	INFTECH	GENIT		M2		
28	INFTECH	GENIT		M5		

	A	B	C	D	E	F
29	INFTECH	GENIT		M3		
30	INFTECH	GENIT		M1		
31	INFTECH	GENIT		M7		
32	INFTECH	GENIT		M6		
33	INFTECH	NETSERV		IC3		
34	INFTECH	NETSERV		IC4		
35	INFTECH	NETSERV		IC5		
36	INFTECH	NETSERV		IC0		
37	INFTECH	RISK		IC4		
38	INFTECH	RISK		IC5		
39	INFTECH	TECH		IC1		
40	INFTECH	TECH		IC2		
41	INFTECH	TECH		IC3		
42	INFTECH	TECH		IC4		
43	INFTECH	TECH		IC5		
44	PRODEV	ENGSVCS		IC4		
45	PRODEV	ENGSVCS		IC5		
46	PRODEV	HWENG		IC2		
47	PRODEV	HWENG		IC3		
48	PRODEV	HWENG		IC4		
49	PRODEV	HWENG		IC5		
50	PRODEV	HWENG		IC6		
51	PRODEV	HWENG		M5		
52	PRODEV	HWENG		M6		
53	PRODEV	PRODMG		IC2		
54	PRODEV	PRODMG		IC3		
55	PRODEV	PRODMG		IC4		

	A	B	C	D	E	F
56	PRODEV	PRODMG		IC5		
57	PRODEV	PRODMG		IC6		
58	PRODEV	PRODMG		M4		
59	PRODEV	PRODMG		M2		
60	PRODEV	PRODMG		M5		
61	PRODEV	PRODMG		M6		
62	PRODEV	PRODMG		IC2		
63	PRODEV	PRODMG		IC3		
64	PRODEV	PRODMG		IC4		
65	PRODEV	PRODMG		IC5		
66	PRODEV	PRODMG		M4		
67	PRODEV	PRODMG		M5		
68	PRODEV	PRODMG		M6		
69	PRODEV	SWENG		IC6		
70	PRODEV	SWENG		IC1		
71	PRODEV	SWENG		IC2		
72	PRODEV	SWENG		IC3		
73	PRODEV	SWENG		IC4		
74	PRODEV	SWENG		IC5		
75	PRODEV	SWENG		M7		
76	PRODEV	SWENG		IC4		
77	PRODEV	SWENG		IC5		
78	PRODEV	SWENG		IC6		
79	PRODEV	SWENG		IC1		
80	PRODEV	SWENG		IC2		
81	PRODEV	SWENG		IC3		
82	PRODEV	SWENG		IC4		
83	PRODEV	SWENG		IC5		
84	PRODEV	SWENG		M4		

	A	B	C	D	E	F
85	PRODEV	SWENG		M2		
86	PRODEV	SWENG		M5		
87	PRODEV	SWENG		M3		
88	PRODEV	SWENG		M6		
89	PRODEV	SWENG		IC2		
90	PRODEV	SWENG		IC3		
91	PRODEV	SWENG		IC4		
92	PRODEV	SWENG		IC5		
93	PRODEV	TECHQA		IC1		
94	PRODEV	TECHQA		IC2		
95	PRODEV	TECHQA		IC3		
96	PRODEV	TECHQA		IC4		
97	PRODEV	TECHQA		IC5		
98	PRODEV	TECHQA		M4		
99	PRODEV	TECHQA		M2		
100	PRODEV	TECHQA		M5		
101	PRODEV	TECHQA		M3		
102	PRODEV	TECHQA		M6		
103	PRODEV	TECHWR		IC3		
104	PRODEV	TECHWR		IC4		
105	PRODEV	TECHWR		IC5		
106	PRODEV	TECHWR		M4		
107	PRODEV	TECHWR		M2		
108	PRODEV	TECHWR		M5		
109	PRODEV	TECHWR		M3		
110	PRODEV	TECHWR		M6		
111	SUPP	PREMSERV		M4		
112	SUPP	PREMSERV		M5		
113	SUPP	PREMSERV		IC5		
114	SUPP	PREMSERV		IC3		
115	SUPP	PREMSERV		IC2		

	A	B	C	D	E	F
116	SUPP	PREMSERV		IC3		
117	SUPP	PREMSERV		IC4		
118	SUPP	PREMSERV		IC5		
119	SUPP	PREMSERV		IC5		
120	SUPP	PRODSUPP		M4		
121	SUPP	PRODSUPP		M2		
122	SUPP	PRODSUPP		M5		
123	SUPP	PRODSUPP		M3		
124	SUPP	PRODSUPP		M6		
125	SUPP	PRODSUPP		IC2		
126	SUPP	PRODSUPP		IC3		
127	SUPP	PRODSUPP		IC4		
128	SUPP	PRODSUPP		IC5		
129	SUPP	SOLSUPP		IC4		
130	SUPP	SUPPACC		IC4		
131	SUPP	SUPPACC		IC5		
132	SUPP	SUPPACC		IC2		
133	SUPP	SUPPACC		IC3		
134	SUPP	SUPPACC		M4		
135	SUPP	SUPPACC		M2		
136	SUPP	SUPPACC		M5		
137	SUPP	SUPPACC		M3		
138	SUPP	SUPPACC		M6		
139				M7		

	H	I	J	K	L	M	N	O
1	Oracle HQCA Analysis of Product Development, Information Technology and Support Job Functions, Job Specialties							
2	and Systems Job Titles by Global Career Levels and Salary Grades							
3	Job Function	Job Specialties	Job Titles Within Job Specialties	Global Career Level by Job Title	Salary Grade by Job Title	# of Employees Within Job	Total # of Employees in Salary Grade	Total # of Titles in Salary Grade
4	INFTECH	GENIT		M7				
5	PRODEV	SWENG		M7				
6	SUPP	SUPPACC		M7				3
7	PRODEV	TECHQA		IC1				1
8	PRODEV	SWENG		IC1				
9	PRODEV	SWENG		IC1				2
10	PRODEV	HWENG		IC2				
11	PRODEV	PRODMG		IC2				
12	PRODEV	PRODMG		IC2				
13	PRODEV	SWENG		IC2				
14	PRODEV	SWENG		IC2				
15	PRODEV	SWENG		IC2				
16	PRODEV	TECHQA		IC2				7
17	INFTECH	BUSIMP		IC3				
18	INFTECH	FUNC		IC3				
19	PRODEV	PRODMG		IC3				
20	PRODEV	PRODMG		IC3				
21	PRODEV	TECHQA		IC3				
22	SUPP	PRODSUPP		M2				
23	SUPP	SUPPACC		M2				7
24	INFTECH	BUSIMP		M2				
25	INFTECH	FUNC		IC4				
26	PRODEV	HWENG		IC3				
27	PRODEV	SWENG		IC3				
28	PRODEV	SWENG		IC3				

	H	I	J	K	L	M	N	O
29	PRODEV	SWENG		IC3				
30	PRODEV	TECHQA		IC4				7
31	INFTECH	BUSIMP		IC4				
32	INFTECH	DCS		IC4				
33	INFTECH	DCS		IC4				
34	INFTECH	GENIT		M2				
35	PRODEV	ENGSVCS		IC4				
36	PRODEV	HWENG		IC4				
37	PRODEV	PRODMG		IC4				
38	PRODEV	PRODMG		IC4				
39	PRODEV	SWENG		IC4				
40	PRODEV	SWENG		IC4				
41	PRODEV	SWENG		IC4				
42	PRODEV	SWENG		IC4				
43	PRODEV	TECHQA		IC5				
44	PRODEV	TECHQA		M2				
45	PRODEV	TECHWR		M2				
46	SUPP	PRODSUPP		M3				
47	SUPP	SUPPACC		M3				17
48	INFTECH	DCS		IC5				
49	INFTECH	DCS		IC5				
50	INFTECH	FUNC		IC5				
51	INFTECH	NETSERV		IC5				
52	INFTECH	RISK		IC5				
53	PRODEV	ENGSVCS		IC5				
54	PRODEV	PRODMG		IC5				
55	PRODEV	PRODMG		IC5				

	H	I	J	K	L	M	N	O
56	PRODEV	SWENG		IC5				
57	PRODEV	SWENG		M2				
58	PRODEV	TECHQA		M3				
59	PRODEV	TECHWR		M3				12
60	INFTECH	BUSIMP		IC5				
61	INFTECH	GENIT		M3				
62	PRODEV	HWENG		IC5				
63	PRODEV	PRODMG		IC6				
64	PRODEV	PRODMG		M2				
65	PRODEV	SWENG		IC5				
66	PRODEV	SWENG		IC5				
67	PRODEV	SWENG		M3				
68	PRODEV	SWENG		IC5				
69	PRODEV	TECHQA		M4				
70	PRODEV	TECHWR		M4				
71	SUPP	PREMSERV		M4				
72	SUPP	PRODSUPP		M4				
73	SUPP	SUPPACC		M4				14
74	INFTECH	GENIT		M4				
75	PRODEV	HWENG		IC6				
76	PRODEV	PRODMG		M4				
77	PRODEV	PRODMG		M4				
78	PRODEV	SWENG		IC6				
79	PRODEV	SWENG		IC6				
80	PRODEV	SWENG		M4				
81	PRODEV	TECHQA		M5				
82	PRODEV	TECHWR		M5				
83	SUPP	PREMSERV		M5				
84	SUPP	PRODSUPP		M5				

	H	I	J	K	L	M	N	O
85	SUPP	SUPPACC		M5				12
86	INFTECH	GENIT		M5				
87	PRODEV	HWENG		M5				
88	PRODEV	PRODMG		M5				
89	PRODEV	PRODMG		M5				
90	PRODEV	SWENG		M5				
91	PRODEV	TECHWR		M6				6
92	INFTECH	GENIT		M6				
93	PRODEV	HWENG		M6				
94	PRODEV	PRODMG		M6				
95	PRODEV	PRODMG		M6				
96	PRODEV	SWENG		M6				
97	PRODEV	TECHQA		M6				
98	SUPP	PRODSUPP		M6				
99	SUPP	SUPPACC		M6				8
100	INFTECH	DCS		IC0				
101	INFTECH	EUSUPP		IC2				
102	INFTECH	NETSERV		IC0				
103	INFTECH	TECH		IC1				
104	SUPP	PREMSERV		IC2				
105	SUPP	PRODSUPP		IC2				
106	SUPP	SUPPACC		IC2				7
107	INFTECH	DCS		IC2				1
108	INFTECH	DCS		IC2				
109	INFTECH	DCS		IC2				
110	INFTECH	EUSUPP		IC3				
111	INFTECH	FUNC		IC2				
112	INFTECH	TECH		IC2				
113	SUPP	PREMSERV		IC3				
114	SUPP	PREMSERV		IC3				
115	SUPP	PRODSUPP		IC3				

	H	I	J	K	L	M	N	O
116	SUPP	SUPPACC		IC3				9
117	INFTECH	DCS		IC3				
118	INFTECH	TECH		IC3				2
119	INFTECH	DCS		IC3				
120	INFTECH	EUSUPP		IC4				
121	INFTECH	GENIT		M1				
122	INFTECH	NETSERV		IC3				
123	PRODEV	TECHWR		IC3				
124	SUPP	PREMSERV		IC4				
125	SUPP	PRODSUPP		IC4				
126	SUPP	SUPPACC		IC4				8
127	INFTECH	DCS		IC4				
128	INFTECH	TECH		IC4				
129	PRODEV	TECHWR		IC4				
130	SUPP	SUPPACC		IC5				
131	SUPP	PREMSERV		IC5				
132	SUPP	PREMSERV		IC5				6
133	INFTECH	NETSERV		IC4				
134	INFTECH	RISK		IC4				
135	INFTECH	TECH		IC5				
136	PRODEV	TECHWR		IC5				
137	SUPP	PREMSERV		IC5				
138	SUPP	PRODSUPP		IC5				
139	SUPP	SOLSUPP		IC4				7