



June 8, 2018

VIA ELECTRONIC MAIL ONLY

Erin M. Connell
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Re: *OFCCP v. Oracle America, Inc.*, Case No. 2017-OFC-00006,
Data Questions

Dear Erin,

Thank you for taking the time to meet with us to provide a tour of some of the data that Oracle produced during discovery. We would like to confirm our understanding of various data fields from our meeting, and follow up with questions that were not answered. Please confirm our understanding, or make adjustments to ensure that we have a mutual understanding:

1. ORACLE_HQCA_0000360321, file name ORA_OFCCP016.zip: Oracle created this spreadsheet from individual files maintained by Oracle's immigration counsel. The spreadsheet contains data for persons who were employed at HQCA in the PRODEV, INFTECH, and/or SUPP job function at any point from January 1, 2013 through January 17, 2017, who at any point during that time, held at H1-B (or E-3) visa.
 - a. We understand EEID to be the same as Employee Number. Is this correct?
2. ORACLE_HQCA_0000062859: This file contains data for offers given to college applicants from January 1, 2013 through May 2015 from a stand-alone system called "Candidate Offers."
 - a. Does this file contain all offers given to college applicants during this period or only hires? We note that there is a Start Date associated with each entry, as well as an Employee ID. Was a start date and employee number generated even for people that did not accept their offers?
 - b. Is the file limited to college applicants who were offered a position in the PT1 job group at HQCA?
 - c. Were there any other filters on this data set?

Exhibit P-209

- d. Does Column D, DATE_START, indicate the date that the individual started working at HQCA?
 - e. We understand Column O, PROPOSAL_QUESTION_NAME, to list questions regarding the Candidate in the same row as the question.
 - i. What does "RECRUITING_INTERNAL" in Column O mean?
 - ii. Confirm that "VISA_REQUIRED" in Column O asks whether the candidate requires a visa to work at Oracle America, Inc.
 - iii. How is "UNSOLICITED_RESUME" in Column O defined? Under what circumstances would a resume be considered "unsolicited" (i.e., "Y" would be the answer to the question)? Under what circumstances would "N" be the answer to this question?
 - iv. Under what circumstances would the answer to "CANDIDATE_REHIRE" in Column O be Y? Who is considered a "rehire?"
 - f. Confirm that Column S, ANSWER_VALUE, provides the answer to the question in Column O that is listed in the same row.
 - g. This file does not contain ethnicity or race data for students receiving college offers.
3. The iRecruitment data in folder I (the compensation data) includes only the data for the persons Oracle hired into positions in the PRODEV, INFTECH and SUPP job functions at HQCA, and excludes data for applicants who were not hired.
 4. iRecruitment continued to be used to process offers to applicants after Taleo went online in approximately May 2015.
 5. Starting in approximately May 2015, Oracle used Taleo to track experienced applicants and requisitions.
 6. iRecruitment uses the term "Vacancy" to refer to an open job position, and Taleo uses the term "Requisition."
 7. In the October 11, 2017 letter Oracle stated that it produced exports related to "vacancies and requisitions for which an individual was hired between January 1, 2013 and January 17, 2017. . ." In other words, the data Oracle provided for "HQCA PT1 Applicants and Hires" in Folder II excludes data about applicants to vacancies or requisitions that were not filled with a hire.
 - a. How did Oracle filter these applicants out of the data?

- i. How many applicants were excluded as a result of filtering to exclude unfilled requisitions/vacancies?
 - ii. How many applications were excluded as a result of filtering to exclude unfilled requisitions/vacancies?
 - b. Is there data in the iRec system between 2013 and May 2015 for college students that was not produced (since the offers were not linked to vacancies)?
 - c. Why is there a "Hire_Type" called "Student/Intern to Regular" in the "HQCA_IREC_DATA.xlsx" file (Column AR), but not in the PT1_HQCA_IREC_MAIN.xlsx file (Column AU)?
 - i. Looking at an example: in "HQCA_IREC_DATA.xlsx" file, in the Offer_Candidates Tab, PARTY_ID 1041494297 has a HIRE_TYPE of "Student/Intern to Regular" in the (Column AR) and a VACANCY_ID of 3051682. In the HQCA_VACANCIES Tab, VACANCY_ID 3051682 is listed as for a Software Developer 2 job in the PT1 job group, and the VACANCY_STATUS column lists the vacancy as "Pending." However, looking at the ALLEARNINGS.xlsx file for the same PARTY_ID, shows that this person did start working at Oracle and earned compensation.
 - ii. Did Oracle exclude any HIRE_TYPES from its data production?
8. Who was included in the Resumate data? Were there any filters applied to the data other than fiscal year? If so, what?

Please answer the following questions about the content of the data Oracle produced (many of which we sent prior to the data tour):

1. PT1_HQCA_iREC_MAIN.xlsx
 - a. What do the descriptions under "Candidate Source" mean?
 - b. What is "Product_Association"?
 - c. What does "Candidate is Internal" Y/N mean? (Does internal mean that the person is transferring from another position within Oracle? Does it include international transfers?)
 - d. What is "channel found"?
 - e. What are "candidatesource" or "candidate_source"? Please explain the various codes.

- f. In Column AE, OFFER_CLOSE_REASON, does “Applicant Hired” mean that the applicant was given an offer, started work at Oracle, or something else?
2. In the Tab APL_EMPLOYMENT_HISTORY, column I is for “EMPLOYER.” When a university is listed, does that mean the applicant attends the university or is employed there?
3. In the APL_QUALIFICATIONS Tab, does the LOCATION in column J refer to the location of the educational institution, the employee, or something else? Does START_DATE in Column K refer to the college state date or something else? Does DATE_RECEIVED in column O mean the date the degree was received by the applicant?
4. In the APPLICANT_PROFILES tab, Column Y is LOCAL_WORKING_PERMIT. When the data indicates “Y” does this mean that the applicant has a visa? Would “N” indicate that the person was a US citizen (and so didn’t need a working permit) or that the applicant needed a working permit but did not have one?
5. Do ethnic_origin, ethnicity and ethnicorigin all contain ethnicity for the identified employee or applicant? These fields are found in the following files:
- a. Emp_Personal_Experience_Qualification_Assign_Details.xlsx
 - b. Candidate - Demographics.xlsx includes Column H “US_Ethnicity,” Column K “Race Question Code” (i.e., what does “ZA Race” mean?), and column L “Race.” What is included in each of these data fields?
 - c. PT1_HQCA_IREC_MAIN.xlsx
6. What are effective_start_date and effective_end_date in Emp_Personal_Experience_Qualification_Assign_Details.xlsx?
7. In the Emp_Personal_Experience_Qualification_Assign_Details.xlsx file
- a. What are actualterminationdate or actual_termination_date?
 - b. How do they relate to effective_end_date?
 - c. What is the relationship between job_function, jobfunction and jobeeogroup?
8. In the Application-Source.xlsx, what is the submissionsourcebl data?
- a. Column I lists a Source Identifier. What are these codes? How are they defined?
9. In the Application Data.xlsx, what are currentworkflow or current workflow?

- a. Does the answer Yes to “Candidate Is Internal?” in Column I mean that the candidate was a current employee of Oracle America or an Oracle affiliate (such as Oracle India)?
 - b. Does Taleo contain data indicating whether an applicant or hire is an international transfer? If so, where?
10. In Application-History.xlsx, does “Submission History,” column L, indicate how the information was submitted to Oracle?
 - a. What does “Integrator, Oracle” mean?
 - b. Does “Candidate” indicate the candidate entered the information?
 - c. Does “System” mean the information was system-generated?
 - d. We assume that when a person’s name is listed, that person input the information. Are all the names listed Oracle employees? If not, who are they?
 11. In the Requisition-Collaborators Database.xlsx what is a “Collaborator?”
 12. What key would you use to link the Resumate data to the other files?
 13. In the AllEarnings.xlsx file, what is included in the ORGANIZATION_HEIRARCHY data field?
 - a. How are those strings composed?
 - b. What do they show about Oracle’s organization?
 14. In the ALLEarnings2.xlsx file please explain the descriptions under “Balance Name.”
 - a. What does “effective” mean?
 15. What in the data would let us identify product line/product line group?
 16. Where can we find data on schedules worked by employees- e.g. scheduled work hours?
 17. Where is information on leaves of absence in the data?

We look forward to your cooperation in resolving these outstanding issues regarding the data. Please let us know if you have questions about our requests.

Sincerely,

A handwritten signature in blue ink, appearing to read "Laura C. Bremer", with a long horizontal flourish extending to the right.

Laura C. Bremer
Senior Trial Attorney