



December 8, 2017

**Via E-Mail**

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Re: *OFCCP v. Oracle America, Inc.*, OALJ Case No. 2017-OFC-00006

Dear Marc:

This letter responds to your letter dated December 5, 2017, and further responds to your letter dated November 14, 2017, both of which include several questions about the data Oracle produced on October 11, 2017. Please note that we are endeavoring to answer your questions promptly in advance of the parties' mediation and in the spirit of cooperation. That said, we will need additional time to respond to some of your questions (in particular, the questions from December 5, which we only received three days ago).

**I. DECEMBER 5 LETTER - SECOND SET OF QUESTIONS RE: ORACLE DATA**

1.a. – Yes, ORACLE\_HQCA\_000062859.xlsx refers to “Candidate Offers.” Our general understanding is that from approximately 2013 to May 2015, College Recruiting used this Candidate Offers system to generate offers to college recruits. ORACLE\_HQCA\_000062859.xlsx reflects that data, which Mallory Cohn referred to as “workflow” in her interview. Please refer to Mallory Cohn’s interview as well as Carla Foster’s.

1.b. – Our general understanding is that the “Applicant Profile” tab in the PT1\_HQCA\_IREC\_MAIN.xlsx file would not typically include individuals hired through College Recruiting. This file, PT1\_HQCA\_IREC\_MAIN.xlsx, is an export from iRecruitment. To our knowledge College Recruiting used iRecruitment starting in May 2015, but for the limited purpose of creating offers. Accordingly, it is our understanding that the “Applicant Profile” tab should generally include information for experienced positions, not college recruits. We believe for the file PT1\_HQCA\_IREC\_MAIN.xlsx, individuals hired through College Recruiting would be included in the tab “Offered Candidates,” where the column “HIRE\_TYPE” includes a “CR” value which we understand to mean “college recruiting.” Similarly, with respect to Taleo, our understanding is that during approximately the same frame in May 2015, College Recruiting started using Taleo to maintain information about College Recruiting hires. Please also refer to Carla Foster’s interviews about iRecruitment and Taleo.

1.c. – Our understanding is that the “channel” field in iRecruitment is used by the manager-user in order to indicate where the applicant came from. Please also refer to Carla Foster’s interview regarding iRecruitment.

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5 – Oracle has endeavored to provide employee identifiers and other keys, where possible, across the spreadsheets that we have produced to allow the cross-referencing of data. For these two particular spreadsheets, if we are understanding your question correctly, it appears that individuals in both spreadsheets can be identified by Person ID.

**II. NOVEMBER 14 LETTER – QUESTION NO. 7**

Despite our efforts and after a reasonably diligent inquiry, to date, we have been unable to determine the precise use of the “resume exists” field. We are not aware of any way to pull resumes using this field, and we did not use “resume exists” to pull any of the resumes that we provided to OFCCP. To our knowledge, we can find no meaningful connection between this “resume exists” field on the one hand, and to iRecruitment or Taleo, on the other. Please also refer to Susan Cussons’ interview.

If you have follow up questions, please let us know.

Very truly yours,

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

Jennifer Pitcher