

PUBLIC RECORD VERSION

EXPORTER QUESTIONNAIRE

**CERTAIN HOLLOW STRUCTURAL SECTIONS EXPORTED FROM
THE REPUBLIC OF KOREA
KUKJE STEEL CO., LTD.**

REVIEW PERIOD: 1 JULY 2013 TO 30 JUNE 2014

RESPONSE DUE BY: 10 NOVEMBER 2014

CASE CONTACT:

TELEPHONE: Chris Harrison
+61 2 6229 1191
FAX: +61 2 6275 6888
EMAIL: operations2@adcommission.gov.au

ADDRESS FOR RESPONSE: Attention: Director Operations 2
Anti-Dumping Commission
Customs House
1010 La Trobe Street
Docklands VIC 3095
AUSTRALIA
By email: operations2@adcommission.gov.au

Please note that a non-confidential version of the reply to this questionnaire must also be provided.

SECTION A – COMPANY STRUCTURE AND OPERATIONS

This section requests information relating to company details and financial reports.

A-1 Identity and communication

Please nominate a person within your company who can be contacted for the purposes of this review:

<Answer>

Head office:

Name: [REDACTED]

Position in the company: **Director**

Address: **461-11, Seogyo-Dong, Mapo-Gu, Seoul, Korea**

Telephone: **82-2-3143-0085**

Facsimile number: **82-2-3143-0082**

E-mail address of contact person: [REDACTED]

Factory:

Address: **854, Song Dong Ri, Daesong-Myun, Nam-Gu, Pohang City, Kyungsangbuk-Do, Korea**

Telephone: **82-54-278-1311**

Facsimile number: **82-54-278-1316**

E-mail address of contact person: [REDACTED]

A-2 Representative of the company for the purpose of review

If you wish to appoint a representative to assist you in this review, provide the following details:

Name: [REDACTED]

Organisation: [REDACTED]

Position: [REDACTED]

Address: [REDACTED]

Telephone: [REDACTED]

Facsimile/Telex number: [REDACTED]

E-mail address of contact person: [REDACTED]

Note that in nominating a representative, the Commission will assume that confidential material relating to your company in this review may be freely released to, or discussed with, that representative.

A-3 Company information

1. What is the legal name of your business? What kind of entity is it (eg. company, partnership, sole trader)? Please provide details of any other business names that you use to export and/or sell goods.

<Answer>

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

Kukje Steel Co., Ltd. (hereinafter “Kukje”) is a limited company and was incorporated on December 24, 1992 in accordance with the Commercial Law of the Republic of Korea. Kukje does not use any other business names for export and/or sell goods.

2. Who are the owners and/or principal shareholders? Provide details of shareholding percentages for joint owners and/or principal shareholders. (List all shareholders able to cast, or control the casting of, 5% or more of the maximum amount of votes that could be cast at a general meeting of your company).

<Answer>

The list of the shareholders of Kukje as of March 31, 2014 is provided as below;

Name	Activity	Shareholding Percentage
XXXXXX	XXXXXX	63.33%
XXXXXX	XXXXXX	13.89%
XXXXXXXX	XXXXXX	13.89%
XXXXXXX	XXXXXXX	5.55%
XXXXXXX	XXXXXXX	2.78%
XXXXXX	XXXXXX	0.56%
Total		100%

3. If your company is a subsidiary of another company list the principal shareholders of that company.

<Answer>

Since Kukje is not a subsidiary of any other company, this question is not applicable to Kukje.

4. If your parent company is a subsidiary of another company, list the principal shareholders of that company.

<Answer>

Since Kukje is not a subsidiary of any other company, this question is not applicable to Kukje.

5. Provide a diagram showing all associated or affiliated companies and your company's place within that corporate structure.

<Answer>

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

XXXXX, a major shareholder of Kukje, also owns **XX**% of shareholdings of Kukje Nylon Co., Ltd, which manufactures and sells machinery for weaving fabrics. However, it should be noted Kukje did not sell the subject goods nor purchase any materials for production of the subject goods.

6. Are any management fees/corporate allocations charged to your company by your parent or related companies.

<Answer>

Since Kukje is not a subsidiary of any other company, this question is not applicable to Kukje.

7. Describe the nature of your company's business. Explain whether you are a producer or manufacturer, distributor, trading company, etc.

<Answer>

Kukje is a producer as well as a seller of steel pipes for ordinary piping and round/square/rectangular steel pipes for various uses.

8. If your business does not perform all of the following functions in relation to GUC, then please provide names and addresses of the companies which perform each function:

- produce or manufacture
- sell in the domestic market
- export to Australia, and
- export to countries other than Australia.

<Answer>

Since Kukje performs all of the above functions in relation to the goods under consideration, this question is not applicable to Kukje.

9. Provide your company's internal organisation chart. Describe the functions performed by each group within the organisation.

<Answer>

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

Kukje has provided its internal organization chart of both headquarters and production facility in **Appendix A-1**. As shown in Appendix A-1, the Seoul Headquarters consists of three teams; administration team, export sales and purchase team, and domestic sales team. The administration team is responsible for recording accounting books and financial activities. The export and purchase team takes care of export sales as well as purchases of raw materials. Domestic market sales are performed by the domestic sales team.

The production facility located in Pohang City consists of three departments as provided in Appendix A-1; Administrative Department, Production Department, and Production Supporting Department. The administrative department is responsible for general affairs such as labour, safety, and environmental issues in the Pohang Plant. The production department is involved in issuing production orders, manufacturing carbon steel pipes for ordinary piping and round/square/rectangular steel pipes for various uses, and raw materials inventory control. On the other hand, the production supporting department is responsible for factory maintenance, inventory control, shipments, and planning and coordinating of production.

10. Provide a list of your business' Board of Directors.

<Answer>

Kukje's list of Board of Directors are as following;

Name	Activity
xxxxxxx	Chairman
xxxxxxx	CEO
xxxxxx	Operating Director

11. Provide a copy of your most recent annual report together with any relevant brochures or pamphlets on your business activities.

<Answer>

Kukje has provided its brochure **in Conf. Appendix A-2**. Also, please refer to the audited financial statements as provided **in Conf. Appendix A-3**.

12. Provide details of all transactions between your company and all related parties. For example:

- Suppling/selling completed or partially completed products.
- Suppling/selling raw materials.
- Performing management functions (including any financial functions).
- Processing (including toll processing) of any raw materials, intermediary or completed products.
- Trading in products/materials supplied by related parties.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

<Answer>

Kukje has following transactions with related parties during the year ended at March 31, 2014.

Name	Relationship	Transactions	Amount (1,000 KRW)
XXXXXX	Related Company	XXXX	XXXX
		XXXX	XXXX
XXXXXX	Major Shareholder	XXXX	XXXX
		XXXX	XXXX

However, Kukje does not have any transaction concerning GUC with the related parties above.

A-4 General accounting/administration information

1. Indicate your accounting period.

<Answer>

Kukje's accounting period starts April 1 and ends March 31 in the next year.

2. Indicate the address where the financial records are held.

<Answer>

Kukje's financial accounting records and cost accounting records are held at the headquarters located in Seoul. By the way, the supporting documentations for cost accounting are held at the Pohang Plant.

3. Provide the following financial documents for the two most recently completed financial years plus all subsequent monthly, quarterly or half yearly statements:
 - chart of accounts;

<Answer>

The translated chart of accounts is provided in Conf. **Appendix A-4.**

- audited consolidated and unconsolidated financial statements (including all footnotes and the auditor's opinion);

<Answer>

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

The audited unconsolidated financial statements including all footnotes and the auditor's opinion for the two most recently completed financial years are provided in Appendix A-3.

- internal financial statements, income statements (profit and loss reports), or management accounts, that are prepared and maintained in the normal course of business for the GUC.

These documents should relate to:

- the division or section/s of your business responsible for the production and sale of the GUC, and
- the company overall.

<Answer>

Since Kukje does not issue any management reports including internal financial statements for the goods under consideration, this question is not applicable to Kukje.

3. If you are not required to have the accounts audited, provide the unaudited financial statements for the two most recently completed financial years, together with your relevant taxation returns. Any subsequent monthly, quarterly or half yearly statements should also be provided.

<Answer>

Since Kukje has provided its audited financial statements in Appendix A-3, this question is not applicable to Kukje.

4. Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If so, provide details.

<Answer>

Since Kukje records all of the transactions in its accounting book in accordance with the generally accepted accounting principles in Korea, this question is not applicable to Kukje.

5. Describe:

The significant accounting policies that govern your system of accounting, in particular:

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

- the method of valuation for raw material, work-in-process, and finished goods inventories (eg last in first out –LIFO, first in first out- FIFO, weighted average);

<Answer>

Inventories are valued by cost method; cost being determined by the weighted-average method, except for goods-in-transit, for which costs are determined by the specific identification method.

- costing methods, including the method (eg by tonnes, units, revenue, direct costs etc) of allocating costs shared with other goods or processes (such as front office cost, infrastructure cost etc);

<Answer>

In the normal course of business, Kukje uses actual costing methods rather than standard costing method. Because Kukje produces carbon steel products only, it simply accumulates material cost, labor and other fabrication costs in a company-wide level. Then, Kukje simply allocated accumulated cost into the individual products based on the production quantities.

- valuation methods for damaged or sub-standard goods generated at the various stages of production;

<Answer>

Kukje does not distinguish cost to damage or substandard goods generated from the production processes in the normal cost accounting system, as the quality of the finished goods are determined after the production is completed.

- valuation methods for scrap, by products, or joint products;

<Answer>

None of steel scraps generated at the slitting and forming stage of production are re-inputted into the production process, but are sold to unaffiliated purchasers. In the normal cost accounting system, however, Kukje does not evaluate the steel scrap cost. Rather, it recognizes income when it sells them.

- valuation and revaluation methods for fixed assets;

<Answer>

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

Properties, plant and equipment are stated at historical cost. Significant additions or improvements extending useful lives of assets are capitalized. However, normal maintenance and repairs are expensed when they are incurred.

- average useful life for each class of production equipment and depreciation method and rate used for each;

<Answer>

The average useful life and depreciation method for each class of fixed assets are provided as follows;

Account	Depreciation Method	Useful Lives (Year)
Buildings	Straight-Line Method	xx
Structures	Straight-Line Method	xx
Machinery	Fixed-Rate Method	xx
Vehicles	Fixed-Rate Method	xx
Tools and Fixtures	Fixed-Rate Method	xx

- treatment of foreign exchange gains and losses arising from transactions;

<Answer>

Gains and losses may be incurred on foreign currency transactions due to exchange rate fluctuations between the time of transactions and the time of payment. The resulting gains and losses are recognized in the income statements as “gains/losses on foreign currency transactions”.

- treatment of foreign exchange gains/losses arising from the translation of balance sheet items;

<Answer>

Assets and liabilities denominated in a foreign currency are translated at the appropriate exchange rate on the balance sheet date. The resulting unrealized foreign currency translation gains (losses) are credited (debited) to the current year's income statement.

- inclusion of general expenses and/or interest;

<Answer>

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

General expenses and interest expenses are debited to the current year's income statements.

- provisions for bad or doubtful debts;

<Answer>

Allowance for doubtful accounts is estimated based on an analysis of individual accounts receivable and past experience of collection of accounts and notes receivable.

- expenses for idle equipment and/or plant shut-downs;

<Answer>

Since Kukje did not have any idle equipment during the period of assessment, this question is not applicable.

- costs of plant closure;

<Answer>

Since no costs of plant closure were incurred during the period of assessment, this question is not applicable.

- restructuring costs;

<Answer>

Since no restructuring costs were incurred during the period of assessment, this question is not applicable.

- by-products and scrap materials resulting from your company's production process; and

<Answer>

Please refer to the above explanations on scrap evaluation.

- Effects of inflation on financial statement information.

<Answer>

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

Since there were no effects of inflation on financial statement information, this question is not applicable.

6. In the event that any of the accounting methods used by your company have changed over the last two years provide an explanation of the changes, the date of change, and the reasons for it.

<Answer>

Since there has been no change of accounting methods over the last two years, this question is not applicable.

A-5 Income statement

Complete the spreadsheet entitled '**Income statement**' within the *HSS Exporter Questionnaire – Korea– accompanying spreadsheet* provided alongside this questionnaire.

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

Explain how costs have been allocated between all products and the GUC within these calculations.

This information will be used to verify the completeness of cost data that you provide in Section G. If, because of your company's structure, the allocations would not be helpful in this process, please explain why this is the case.

Note: if your financial information does not permit you to present information in accordance with this table please present the information in a form that closely matches the table.

<Answer>

The spreadsheet of "Income Statement" has been provided in Conf. **Appendix A-5**.

A-6 Sales

Complete the spreadsheet entitled '**Turnover**' within the *HSS Exporter Questionnaire – Korea– accompanying spreadsheet* provided alongside this questionnaire.

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

In completing the sheet, use the currency in which your accounts are kept.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

This information will be used to verify the cost allocations to the GUC in Section G.

Also, you should be prepared to demonstrate that sales data shown for the GUC is a complete record by linking total sales of these goods to relevant financial statements.

<Answer>

The spreadsheet of “TURNOVER” has been provided in Conf. Appendix A-6.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

SECTION B – SALES TO AUSTRALIA (EXPORT PRICE)

This section requests information concerning your export practices and prices to Australia. You should include costs incurred beyond ex-factory.

Export prices are usually assessed at FOB point, but the Commission may also compare prices at another level (e.g. ex factory).

*You should report prices of **all GUC shipped to Australia during the review period.***

The invoice date will normally be taken to be the date of sale. If you consider:

- the sale date is not the invoice date (see 'date of sale' column explanation in question B4 below) and;*
- an alternative date should be used when comparing export and domestic prices*

*you **must** provide information in section D on domestic selling prices for a matching period - even if doing so means that such domestic sales data predates the commencement of the review period.*

B-1 For each customer in Australia to whom you shipped goods in the review period list:

- name;
- address;
- contact name and phone/fax number where known; and
- trade level (for example: distributor, wholesaler, retailer, end user, original equipment).

<Answer>

During the period of the review, Kukje had **xxx** customer in Australia, whose information is as follows;

name; **XXXXXXXXXXXXXXXXXX**

address; **XXXXXX**

contact name ; **XXXXXX**

phone number : **XXXXXX**

fax number : **XXXXXX**

trade level (for example: distributor, wholesaler, retailer, end user, original equipment) : **XXXXXX**

Also, Kukje exported the GUC to **xxxxx** through **xxxxx**, an unaffiliated Korean trading company for **xxxxx** purpose, because **XXXXXXXXXXXXXXXXXX**. It means Kukje issued invoices to **xxxxx** but made shipments to **xxxxxx**. To the best knowledge, **xxxxxx** added a **xxxxx** and re-invoiced to **xxxxx**, because **xxxxxx** used **xxxxxx** to import the GUC from Kukje. Therefore, it should be noted that Kukje reported export price to **xxxxx** in this response, because it would be an export price to the first unaffiliated customer for export sales to Australia. The detail of **xxxxx** information is as follows; (details on use of an intermediary in respect of transactions)

PUBLIC RECORD VERSION-KUKJE STEEL -KOREA

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

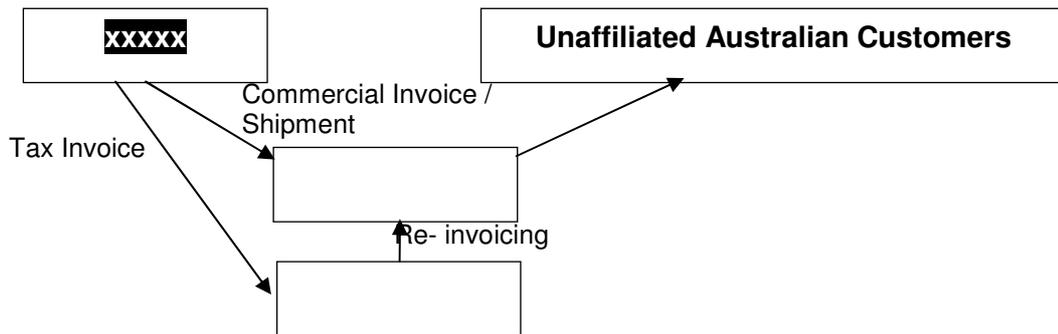
name; [REDACTED]
address; [REDACTED]
contact name ; [REDACTED]
phone number : [REDACTED]
fax number : [REDACTED]
trade level (for example: distributor, wholesaler, retailer, end user, original equipment) : [REDACTED]

B-2 For each customer identified in B1 please provide the following information.

(a) Describe how the GUC are sent to each customer in Australia, including a diagram if required.

<Answer>

The goods were shipped directly from Kukje to the premises designated by Australian customer. The diagram during the period of the review is as follows;



The terms of sales for direct export sales are all FOB Korean port. And, terms and prices of export sales are determined based on the individual transaction negotiation.

(b) Identify each party in the distribution chain and describe the functions performed by them. Where commissions are paid indicate whether it is a pre or post exportation expense having regard to the date of sale.

<Answer>

Kukje is a manufacturer of GUC and arranges inland transportation of GUC to the Korean port. Since all export sales to Australia are FOB delivery term, ocean freights are arranged and disbursed by the Australian customers. No commission was paid in relation to the export sales to Australia during the period of the review.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

xxxxxxx. (transaction details)

- (c) Explain who retains ownership of the GUC at each stage of the distribution chain. In the case of delivered duty paid (DDP) sales, explain who retains ownership when the GUC enter Australia.

<Answer>

Since all export sales to Australia are FOB delivery term, the ownership of GUC is transferred to the customers from Kukje when it ships GUC at the Korean port and issues its commercial invoice or tax invoice to the customers. It should be noted that there were no DDP sales during the period of the review.

- (d) Describe any agency or distributor agreements or other contracts entered into in relation to the Australian market (supply copy of the agreement if possible).

<Answer>

Since, during the review, Kukje did not have any agency or distributor agreements or other contracts entered into in relation to the Australian market, this question is not applicable to Kukje.

- (e) Explain in detail the process by which you negotiate price, receive orders, deliver, invoice and receive payment. If export prices are based on price lists supply copies of those lists.

<Answer>

The first stage in the sales process for Kukje's sales to Australian unaffiliated customers is receipt of an inquiry (typically by fax or e-mail) from the customer. Kukje then discusses the order with the customer to determine the price and other sales terms. Once an agreement has been reached, the customer prepares and sends a purchase contract to Kukje by fax or e-mail. In order to confirm the purchase contract, Kukje modify it and sends the signed contract to the Australian customer .Next, Kukje's sales staff prepares an internal production request, which is sent to the factory for manufacturing GUC.

Once productions are completed, Kukje ships GUC to the customer, and sends commercial invoice and packing list at the same time. It should be noted that there were no price lists used during the period of assessment.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

- (f) State whether your firm is related to any of its Australian customers. Give details of any financial or other arrangements (eg free goods, rebates, or promotional subsidies) with the customers in Australia (including parties representing either your firm or the customers).

Because Kukje does not have any related companies, this question is not applicable.

- (g) Details of the forward orders of the GUC (include quantities, values and scheduled shipping dates).

The list of purchase orders which are confirmed after the POR but not shipped as of September 30, 2014 is provided in Conf. Appendix – B-1

- B-3** Do your export selling prices vary according to the distribution channel identified? If so, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

<Answer>

Since the sales price as well as other sales terms is determined on a transaction-by-transaction basis, this question is not applicable to Kukje.

- B-4** Complete the spreadsheet entitled '**Australian sales**' within the *HSS Exporter Questionnaire –Korea– accompanying spreadsheet* provided alongside this questionnaire.

This spreadsheet is to list **all** shipments (i.e. transaction by transaction) to Australia **of the GUC** (do not include non-GUC items) in the review period.

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

The below table provides information as to what is meant by each column heading within the spreadsheet.

Column heading	Explanation
Customer name	names of your customers
Level of trade	the level of trade of your customers in Australia
Product code	Code used in your records for the model/grade/type identified. A product code must be a unique identifier of that product. Explain the product codes in your submission.
Type (CHS / RHS)	Indicate whether it is a circular or rectangular (including square) type HSS
Standard	Production standard of the HSS (TIS 107, AS/NZ 1163 etc.)
Width	Width of the tube (or insert radius if circular pipe)

PUBLIC RECORD VERSION-KUKJE STEEL -KOREA

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

Height	Height of the tube (leave blank if circular pipe)
Length	Length of the product
Nominal Thickness	Nominal (theoretical) thickness
Actual Thickness	Actual (or target) thickness
Grade	Grade of product i.e. 350CL0 or 250C etc.
Finish	identify the finish of the HSS sold
Invoice number	invoice number
Invoice date	invoice date
Date of sale	refer to the explanation at the beginning of this section. If you consider that a date <i>other than</i> the invoice date best establishes the material terms of sale, report that date. For example, order confirmation, contract, or purchase order date.
Order number	if applicable, show order confirmation, contract or purchase order number if you have shown a date other than invoice date as being the date of sale.
Shipping terms	Delivery terms eg. CIF, C&F, FOB, DDP (in accordance with Incoterms)
Payment terms	agreed payment terms eg. 60 days=60 etc
Quantity (pcs)	Number of pieces of HSS sold (if shown on the invoice).
Theoretical Weight	Weight of this product shown on the invoice.
Target Weight	Total target weight of this product in the shipment
Actual Weight	Total actual weight of this shipment (from scale readings)
HRC Code	The raw material code of the HRC used in production of this product (the code in your accounting and/or MRP systems for the type of HRC used in manufacturing of this product)
Gross invoice value	gross invoice value shown on invoice <i>in the currency of sale, excluding taxes.</i>
Discounts	if applicable, the amount of any discount deducted on the invoice on each transaction. If a % discount applies show that % discount applying in another column.
Rebates	The amount of any deferred rebates or allowances paid to the importer in the currency of sale.
Other charges	any other charges, or price reductions, that affect the net invoice value. Insert additional columns and provide a description.
Invoice currency	the currency used on the invoice
Exchange rate	Indicate the exchange rate used to convert the currency of the sale to the currency used in your accounting system
Net invoice value	the net invoice value expressed in your domestic currency as it is entered in your accounting system
Other discounts	The actual amount of discounts not deducted from the invoice. Show a separate column for each type of discount.
Ocean freight**	the actual amount of ocean freight incurred on each export shipment listed.
Marine insurance	Amount of marine insurance

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

FOB export price**	the free on board price at the port of shipment.
Packing*	Packing expenses
Inland transportation costs*	inland transportation costs included in the selling price. For export sales this is the inland freight from factory to port in the country of export.
Handling, loading & ancillary expenses*	handling, loading & ancillary expenses. For example, terminal handling, export inspection, wharfage & other port charges, container tax, document fees & customs brokers fees, clearance fees, bank charges, letter of credit fees, & other ancillary charges incurred in the exporting country.
Warranty & guarantee expenses*	warranty & guarantee expenses
Technical assistance & other services*	expenses for after sale services, such as technical assistance or installation costs.
Commissions*	Commissions paid. If more than one type is paid insert additional columns of data. Indicate in your response to question B2 whether the commission is a pre or post exportation expense having regard to the date of sale.
Other factors*	any other costs, charges or expenses incurred in relation to the exports to Australia (include additional columns as required). See question B5.

Notes

* These costs are further explained in section E-1.

** FOB export price and Ocean Freight:

FOB export price: An FOB export price must be calculated for each shipment - regardless of the shipping terms. FOB price includes inland transportation to the port of exportation, inland insurance, handling, and loading charges. It excludes post exportation expenses such as ocean freight and insurance. Use a formula to show the method of the calculation on each line of the export sales spreadsheet.

Ocean freight: as ocean freight is a significant cost it is important that the actual amount of ocean freight incurred on each exportation be reported. If estimates must be made you must explain the reasons and set out the basis - estimates must reflect changes in freight rates over the review period.

Freight allocations must be checked for consistency.

<Answer>

Please find the computer file “Australian Sales” **xxxxxxx** accompanying this response, which lists all of the export sales of GUC to Australia on a transaction-by-transaction basis during the period of the review.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

The sample print-out of “Australian Sales” is provided in Conf. Appendix B-2. The field layout of “Australian Sales”, including a complete description, is also provided in Conf. Appendix B-2-1.

As shown in Appendix B-2-1, Kukje provided actual quantity in M/T in addition to [REDACTED] quantity in M/T, because all export sales to Australia were made based on [REDACTED]. Since Australian Standard (AS1163) [REDACTED]%. Kukje uses [REDACTED]. For example, [REDACTED]. However, domestic sales for comparable models were made based on [REDACTED].

Consequently, for [REDACTED] comparison, Kukje provided [REDACTED] (details on differences in domestic and export sales ordering & invoicing)

Kukje prepared shipping documents such as commercial invoice, packing list after completion of production for export sales to Australia. Then, it arranged shipments to the port and received bill of lading(B/L) from international shipping company.

With regard to the date of sale, Kukje firmly believes that the date [REDACTED] should be used as the date of sale in the “Australian Sales” listing. Once an agreement on sales terms has been reached between the two parties, the Australian customer normally issues a purchase order to Kukje. In response to the purchase order, Kukje gives order confirmation to the customer and/or the customer’s Korean agent.

Regarding the packing costs, since there is no significant difference in packing costs between domestic sales and export sales, Kukje has reported zero amount in both “Australian Sales Listing” and “Domestic Sales Listing”.

- B-5** If there are any other costs, charges or expenses incurred in respect of the exports listed above which have not been identified in the table above, add a column within the ‘Australian sales’ spreadsheet (see “other factors” in question B-4) for each item, and provide a description of each item. For example, other selling expenses (direct or indirect) incurred in relation to the export sales to Australia.

<Answer>

Kukje has added one column for reporting “Bank Charges” in the “Australian Sales Listing”.

- B-6** For each type of discount, rebate, or allowance offered on export sales to Australia:
- provide a description; and

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

- explain the terms and conditions that must be met by the importer to obtain the discount.

Where the amounts of these discounts, rebates etc are not identified on the sales invoice, explain how you calculated the amount shown in your response to question B4. If they vary by customer or level provide an explanation.

<Answer>

Since Kukje did not incur any discount, rebate or allowance in relation to the export sales to Australia during the period of assessment, this question is not applicable to Kukje.

- B-7** If you have issued credit notes (directly or indirectly) to the customers in Australia, in relation to the invoices listed in the detailed transaction by transaction listing in response to question B4, provide details of each credit note if the credited amount has **not** been reported as a discount or rebate.

<Answer>

Since Kukje did not issue any credit notes in relation to the export sales to Australia during the period of assessment, this question is not applicable to Kukje.

- B-8** If the delivery terms make you responsible for arrival of the GUC at an agreed point within Australia (eg. delivered duty paid), insert additional columns in the spreadsheet for all other costs incurred. For example:

Import duties	Amount of import duty paid in Australia
Inland transport	Amount of inland transportation expenses within Australia included in the selling price
Other costs	Custom brokers, port and other costs incurred (itemise)

<Answer>

Since Kukje did not make any export sales to Australia under DDP delivery term during the assessment period, this question is not applicable to Kukje.

- B-9** Select two shipments, in different quarters of the review period, and provide a complete set of all of the documentation related to the export sale. For example:

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

- the importer's purchase order, order confirmation, and contract of sale;
- commercial invoice;
- bill of lading, export permit;
- freight invoices in relation to movement of the GUC from factory to Australia, including inland freight contract;
- marine insurance expenses; and
- letter of credit, and bank documentation, proving payment.

The Commission will select additional shipments for payment verification at the time of the visit.

<Answer>

Kukje has provided a complete set of all of the documentations related to the two selected export sales to Australia in Conf. Appendix B-3.

xxx	xxxxxxxxxxxxxxxxxxxxxxxxxxxx	
-----	------------------------------	--

2) Industrial Specification

Kukje uses xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx.

3) Size

Rectangular pipes: Height X Width X Thickness

Circular pipes : Outside Diameter X Thickness

As shown above, Kukje’s product codes distinguish the goods by raw material used and measurement for its inventory control tracking system. For example, steel pipes measured in milli-meter and inch are coded differently. Within the same product codes, Kukje can further distinguish the product by industrial specification, size, surface finish and end finish.

For the detail description of the goods Kukje has produced during the review period, please refer to the product catalogue which has already been provided in Appendix A-2.

C-2 List each model/type of the good exported to Australia (these models should cover all models listed in spreadsheet “**Australian Sales**” – See section B of this questionnaire).

<Answer>

As explained above, Kukje’s product does not allow to distinguish the specific product for proper comparison between products sold in the domestic market and product exported to Australian market during the assessment period. For the product comparison, Kukje proposes the following criteria.

1) Usage application

In steel pipe industry, industrial standard of each country specifies physical properties and chemical composition. During the review period, Kukje exported only one industrial standard products (xxxxxxxxxxxxxxxxxxxx). However, Kukje sold the following various industrial specifications in the domestic market.

- Carbon steel pipes for ordinary piping (xxxxxxxxxxxxxxxxxxxx)

- Carbon steel pipes for pressure service (xxxxxxxxxxxxxxxxxxxx)

- Standard carbon steel pipes (xxxxxxxxxxxxxxxxxxxx)

- Semi-bright square & rectangular tubing (xxxxxxxxxxxxxxxxxxxx)

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

- General steel pipes for general structural purposes (XXXXXXXXXXXXXXXXXXXX)
- Carbon steel rectangular pipes for general structural purposes (XXXXXXXXXXXX)
- Carbon steel pipes for machine structural purposes (XXXXXXXXXXXXXXXX)

Comparable Australian Standards of the above specifications are as follows.

Domestic sales specification	Comparable AS	Remarks
XXXXXXXXXXXXXXXXXXXX	AS 1074	Ordinary service
XXXXXXXXXXXXXXXXXXXX	AS 1163	General purpose
XXXXXXXXXXXXXXXXXXXX	AS 1450	Mechanical purpose
XXXXXXXXXXXXXXXXXXXX		Pressure piping

Kukje assigned specification code as follows. Furthermore, Kukje made and sold some pipes for XXXXXXXXXXXX application and these XXXXXXXXXXXX pipes are treated as different from subject goods (Non subject goods), which Kukje coded differently from structural purpose ;

- Structural purpose : circular pipe – XX, Rectangular Pipe – XX
- XXXXXX application : Circular pipe – XXX, Rectangular pipe – XXX
- XXXXXX purpose : circular pipe – XXX, Rectangular pipe – XXX

It should be noted that Korea Standard (KS) and Japan Standard (JIS) for steel pipe are exactly the same.

2) Surface finish

Kukje does not have pickling & oiling process, galvanizing process, nor cold-rolling process. Therefore, Kukje purchased H/R coils for black finish pipes, C/R coils for cold rolled steel pipes, EGI coils for electrically galvanized pipes, HGI coils for hot dipped galvanized pipes, P/O coils for pickled & oiled steel pipes. Also, Kukje produces painted surface finishes pipes by using black finished pipes. Accordingly, Kukje assigned the following codes by surface finish.

- Black finish - HH, Cold-rolled finish - CR, EGI finish - EG, HGI finish - HG, Pickled & oiled finish - PO, Painted finish - PP

3) End finish.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

Kukje does not have threading and coupling process and produced plain finished products only. In certain case, [REDACTED] (domestic special orders)

4) Size.

Kukje's four ERW forming machines can produce steel tubes from [REDACTED] mm ([REDACTED] inch) to [REDACTED] ([REDACTED] inch) and square pipes from [REDACTED]mm x [REDACTED]mm and [REDACTED]mm x [REDACTED]mm. Because of the following reasons, Kukje did not distinguish size for product comparison.

First, Kukje can produce small size only and domestic sales price as well as export sales price does not vary by size.

Second, size mix for domestic sales and export sales to Australia are not different significantly. It means domestic customers as well as Australian customer purchases all size products. Accordingly, average size for domestic sales is virtually the same as that of export sales to Australia.

Third, Kukje's cost accounting system does not allow to calculate size-specific production cost, because it does not maintain machine hours nor labor hours to produce specific cost by pipe size. Rather, it allocates fabrication cost to each product based on production quantity. Also, cost difference by pipe size is negligible, if any, because fabrication cost is less than [REDACTED]% of total manufacturing cost.

Based on the above product classification criteria, model comparison between domestic sale and export sales to Australia is provided in Conf, Appendix C-1.

- C-3** If you sell like goods on the domestic market, for each model/type that your company has exported to Australia during the review period, list the most comparable model(s) sold domestically and provide a detailed explanation of the differences where those goods sold domestically (ie. the like goods – see explanation in glossary) are not identical to the GUC exported to Australia.

This should be done by completing the spreadsheet entitled '**Like goods**' within the *HSS Exporter Questionnaire – Korea– accompanying spreadsheet* provided alongside this questionnaire, detailing as follows:

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

EXPORTED MODEL	DOMESTIC MODEL	IDENTICAL?	DIFFERENCES
Product code of each model of the GUC exported to Australia	Product code of comparable model sold on the domestic market of the country of export	If goods are identical indicate "YES". Otherwise "NO"	Where the good exported to Australia is not identical to the like goods in terms of: GRADE; SIZE; WALL THICKNESS; SHAPE; FINISH, describe the specification differences. If it is impractical to detail specification differences in this table refer to documents which outline differences

<Answer>

As fully explained above, Kukje’s cost accounting system cannot distinguish cost difference by each specific industrial specification of steel and size of the pipe. Accordingly, [REDACTED]. For the comparison table please refer to Conf. Appendix C-1.

During the period of the review, Kukje exported pipes for general [REDACTED] application only to Australian market. For the production of general [REDACTED] pipes, Kukje use the same raw materials between export market and domestic market. Industrial specifications of general [REDACTED] pipes produced and sold during the POR are as follows.

- 1) [REDACTED]
- 2) [REDACTED]
- 3) [REDACTED]

To produce the above general [REDACTED] pipes, Kukje uses the following industrial specification of raw materials, because the following specification of hot coils meet physical and chemical properties required by above specification of pipe products.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

Model	Pipe Specification	HRC Specification	HRC Code(*)
xxxxx xxxxx	AS/NS 1163 C-350 JIS G3444 STK400	xxxxxxx	xxxxxx
	JIS G3444 STK500	xxxxxxx	xxxxxx
xxxxxx xxxxxx xxxxxx	AS/NS 1163 C-350/250 JIS G3444 STK400	xxxxxxx xxxxxxx	xxxxxxx
	JIS G3466 STKR400	xxxxxxx	
	KS D3566 SPSR400/290	xxxxxxx	
	JIS G3444 STK-490/500	xxxxxxx xxxxxxx xxxxxxx	xxxxxxx

(*) Please note Kukje uses various specifications of raw materials within the same category as far as the physical and chemical properties of raw materials meet the quality requirement of pipes produced.

As shown above, xxxxxx and xxxxxx were used to produce JIS G3444 STK 490/500 which were sold in the domestic market only. Even though these products are slightly expensive than commercial grade (xxxxxx), Kukje does not claim the adjustment, because the difference is immaterial and its cost accounting system does not allow to calculate cost difference.

In addition, as shown in Appendix C-1, xxxxxxxxxxxxxxxxxxxxxxxx Finish-Plain End)'' was exported to Australia but not sold in the domestic market. Therefore, Kukje xxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxx(Finish-Plain End)'' for normal value calculation after making appropriate adjustment of production cost difference incurred due to the physical difference. It should be noted that this methodology was used in the original investigation

C-4 Please provide any technical and illustrative material that may be helpful in identifying or classifying the GUC that your company sells on the domestic market.

<Answer>

The description of the goods Kukje sells on the domestic market has been provided in response to question C-1 and C-2, above. Also, for specification details, please refer to the product catalogue which has already been provided in Appendix A-2.

SECTION D – DOMESTIC SALES

This section seeks information about the sales arrangements and prices in the domestic market of the country of export.

*All domestic sales **of like goods to the GUC** made during the review period by **your company and through your related companies** must be listed transaction by transaction. If there is an extraordinarily large volume of sales data and you are unable to provide the complete listing electronically you **must** contact the Case Manager **before** completing the questionnaire.*

If the Case Manager agrees that it is not possible to obtain a complete listing he or she will consider a method for sampling that meets the Commission requirements. If agreement cannot be reached as to the appropriate method the Commission may not visit your company. the Commission will normally take the invoice date as being the date of sale in order to determine which sales fall within the review period.

*If, in response to question B4 (Sales to Australia, Export Price), you have reported that the date of sale is not the invoice date and you consider that this alternative date should be used when comparing domestic and export prices you **must** provide information on domestic selling prices for a matching period - even if doing so means that such domestic sales data predates the commencement of the review period.*

If you do not have any domestic sales of like goods you must contact the Case Manager who will explain the information the Commission requires for determining a normal value using alternative methods.

<Answer>

Kukje used [REDACTED] sales as explained below, [REDACTED] (date of sale treatment)

GUC refer to [REDACTED] tubes and hence domestic data also complies with same [REDACTED] tube category.

D-1 Provide:

- a detailed description of your distribution channels to domestic customers, including a diagram if appropriate;
- information concerning the functions/activities performed by each party in the distribution chain; and
- a copy of any agency or distributor agreements, or contracts entered into.

If any of the customers listed are associated with your business, provide details of that association. Describe the effect, if any, that association has upon the price.

<Answer>

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

Kukje sells GUC to unaffiliated end-users and distributors on the domestic market. The sales price does not vary depending on the customer category. Rather, the sales price is normally determined by individual negotiation on a transaction-by-transaction basis.

- D-2** Do your domestic selling prices vary according to the distribution channel identified? If so, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

<Answer>

As stated above, the domestic selling prices do not vary according the distribution channel or customer category. Rather, the selling prices are normally determined by individual negotiation on a transaction-by-transaction basis.

- D-3** Explain in detail the sales process, including:

- the way in which you set the price, receive orders, make delivery, invoice and finally receive payment; and the terms of the sales; and
- whether price includes the cost of delivery to customer.

If sales are in accordance with price lists, provide copies of the price lists.

<Answer>

Upon customers' purchase inquiry, Kukje's sales personnel taking care of domestic market normally negotiates sales terms with the customers by phone or on-site visit. Once the verbal negotiations are settled, Kukje inquires its factory if it has sufficient inventory to satisfy the customers' needs, and makes shipment schedule. When the ordered goods are shipped, Kukje issues a shipping invoice. In addition, in order to settle the payment, Kukje normally issues a tax invoice and commercial invoice to its customers at the end of each month. After receiving the tax invoices, the customers pay the bill in cash or by promissory notes. Kukje has reported the invoice date as the date of sale, and the tax invoice number as invoice number in its domestic sales listing.

There are two types of delivery terms in domestic market sales; Delivered and Ex-Factory. In the case of "delivered" terms, Kukje ships the goods to the designated location, and the inland transportation costs are included in the selling prices. On the other hand, Kukje does not pay any transportation costs for "ex-factory" delivery terms.

As stated above, the domestic selling prices are determined in accordance with individual negotiation rather than price list.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

- D-4** Complete the spreadsheet entitled '**Domestic sales**' within the *HSS Exporter Questionnaire – Korea– accompanying spreadsheet* provided alongside this questionnaire.

This spreadsheet is to list **all domestic sales of like goods** (i.e. transaction by transaction) in the review period (do not include non-GUC items) **sold by your company and through your related companies**.

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

The below table provides information as to what is meant by each column heading within the spreadsheet.

Column Heading	Explanation
Customer name	names of your customers. If an English version of the name is not easily produced from your automated systems show a customer code number and in a separate table list each code and name.
Level of trade	the level of trade of your domestic customer
Product code	Code used in your records for the model/grade/type identified. A product code must be a unique identifier of that product. Explain the product codes in your submission.
Type (CHS / RHS)	Indicate whether it is a circular or rectangular (including square) type HSS
Standard	Production standard of the HSS (TIS 107, AS/NZ 1163 etc.)
Height	Height of the tube (leave blank if circular pipe)
Length	Length of the product
Nominal Thickness	Nominal (theoretical) thickness
Actual Thickness	Actual (or target) thickness
Grade	Grade of product i.e. 350CL0 or 250C etc.
Finish	identify the finish of the HSS sold
Invoice number	invoice number
Invoice date	invoice date
Date of sale	refer to the explanation at the beginning of this section. If you consider that a date <i>other than</i> the invoice date best establishes the material terms of sale, report that date. For example, order confirmation, contract, or purchase order date.
Dispatch Date	Date of dispatch
Order number	if applicable, show order confirmation, contract or purchase order number if you have shown a date other than invoice date as being the date of sale.
Delivery terms	Delivery terms eg. CIF, C&F, FOB, DDP (in accordance with Incoterms)
Payment terms	agreed payment terms eg. 60 days=60 etc
Quantity (pcs)	Number of pieces of HSS sold (if shown on the invoice).

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

Theoretical Weight	Weight of this product shown on the invoice.
Target Weight	Total target weight of this product in the shipment
Actual Weight	Total actual weight of this shipment (from scale readings)
HRC Code	The raw material code of the HRC used in production of this product (the code in your accounting and/or MRP systems for the type of HRC used in manufacturing of this product)
Gross invoice value	gross invoice value shown on invoice <i>in the currency of sale, excluding taxes.</i>
Discounts	if applicable, the amount of any discount deducted on the invoice on each transaction. If a % discount applies show that % discount applying in another column.
Rebates	The amount of any deferred rebates or allowances paid to the importer in the currency of sale.
Other charges	any other charges, or price reductions, that affect the net invoice value. Insert additional columns and provide a description.
Net invoice value	the net invoice value expressed in your domestic currency as it is entered in your accounting system
Other discounts	The actual amount of discounts not deducted from the invoice. Show a separate column for each type of discount.
Packing*	Packing expenses
Inland transportation costs*	inland transportation costs included in the selling price.
Handling, loading & ancillary expenses*	handling, loading & ancillary expenses.
Warranty & guarantee expenses*	warranty & guarantee expenses
Technical assistance & other services*	expenses for after sale services, such as technical assistance or installation costs.
Commissions*	Commissions paid. If more than one type is paid insert additional columns of data. Explain in your response to this question in detail in D-6.
Other factors*	any other costs, charges or expenses incurred in relation to the sale. (include additional columns as required). See question B5.

Notes

Costs marked with * are explained in section E-2.

<Answer>

Please find the attached computer file “Domestic Sales” listing in **XXXXXXXXXXXX** accompanying this response, which lists all sales of like goods to the domestic customer on a transaction-by-transaction basis during the reporting period.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

The sample print-out of “Domestic Sales” listing has been provided in Conf. Appendix D-1. The field layout of “Domestic Sales”, including a complete description, has been provided in Conf. Appendix D-1-1.

As fully discussed in the response to question B-4 above (Australian sales), Kukje added [REDACTED] for export sales. As Kukje sells the goods at [REDACTED] in domestic market, [REDACTED] product code is the same [REDACTED]. In the case of Australian export sales, Kukje normally states a [REDACTED] in its commercial invoice. Therefore, for a fair comparison, the difference [REDACTED].

Also [REDACTED] (details on transaction differences)

- D-5** If there are any other costs, charges or expenses incurred in respect of the sales listed which have not been identified in the table in question D-4 above add a column for each item (see “other factors”). For example, certain other selling expenses incurred.

<Answer>

Kukje has reported credit expenses on a transaction-by-transaction basis in additional columns in the “Domestic Sales” listing. Detailed descriptions have been provided in Section E-2.

- D-6** For each type of commission, discount, rebate, allowance offered on domestic sales of like goods:
- provide a description; and
 - explain the terms and conditions that must be met by the customer to qualify for payment.

Where the amounts of these discounts, rebates etc are not identified on the sales invoice, explain how you calculated the amounts shown in your response to question D4.

If you have issued credit notes, directly or indirectly to the customers, provide details if the credited amount has **not** been reported as a discount or rebate.

<Answer>

In case where certain goods were returned from customers, Kukje normally issued a credit invoice. In this case, Kukje has reported a net quantity and sales invoice value after offsetting in the “Domestic Sales” listing.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

D-7 Select two domestic sales, in different quarters of the review period, that are at the same level of trade as the export sales.

Provide a complete set of documentation for those two sales. Include, for example:

- purchase order
- order acceptance
- commercial invoice
- discounts or rebates applicable
- credit/debit notes
- long or short term contract of sale
- inland freight contract
- bank documentation showing proof of payment.

The Commission will select additional sales for verification [at the time of our visit](#).

<Answer>

Kukje has provided supporting documentations for selected two samples in Conf. Appendix D-2.

SECTION E – FAIR COMPARISON

Section B sought information about the export prices to Australia and Section D sought information about prices on your domestic market for like goods (ie. the normal value).

Where the normal value and the export price are not comparable adjustments may be made. This section informs you of the fair comparison principle and asks you to quantify the amount of any adjustment.

As prices are being compared, the purpose of the adjustments is to eliminate factors that have unequally modified the prices to be compared.

To be able to quantify the level of any adjustment it will usually be necessary to examine cost differences between sales in different markets. The Commission must be satisfied that those costs are likely to have influenced price. In practice, this means that the expense item for which an adjustment is claimed should have a close nexus to the sale. For example, the cost is incurred because of the sale, or because the cost is related to the sale terms and conditions.

Conversely, where there is not a direct relationship between the expense item and the sale a greater burden is placed upon the claimant to demonstrate that prices have been affected, or are likely to have been affected, by the expense item. In the absence of such evidence the Commission may disallow the adjustment.

Where possible, the adjustment should be based upon actual costs incurred when making the relevant sales. However, if such specific expense information is unavailable cost allocations may be considered. In this case, the party making the adjustment claim must demonstrate that the allocation method reasonably estimates costs incurred.

A party seeking an adjustment has the obligation to substantiate the claim by relevant evidence that would allow a full analysis of the circumstances, and the accounting data, relating to the claim.

The review must be completed within strict time limits therefore you must supply information concerning claims for adjustments in a timely manner. Where an exporter has knowledge of the material substantiating an adjustment claim that material is to be available at the time of the verification visit. The Commission will not consider new claims made after the verification visit.

As fully explained in the response to Question B-4 (Sales to Australia) and Question D-4(Domestic sales), there are difference in sale XXXXXXXXXXXXXXXXXX. All export sales to Australia were made XXXXXXXXXXXXXX. However, domestic sales XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

(differences on sales basis for domestic and export transactions)

E-1 Costs associated with export sales

(These cost adjustments will relate to your responses made at question B-4, ‘**Australian Sales**’)

1. Transportation

Explain how you have quantified the amount of inland transportation associated with the export sale (“**Inland transportation costs**”). Identify the general ledger account where the expense is located. If the amount has been determined from contractual arrangements, not from an account item, provide details and evidence of payment.

<Answer>

Kukje shipped GUC to the Korean ports for the export sales to Australia during the investigation period. The transportation services were provided by unaffiliated trucking companies. Please note that loading/unloading fee is included in “Inland Transport”, as these expenses are usually charged by trucking company, at the same time.

The reported inland transportation expenses are the actually incurred freight charge, calculated on a vessel-specific basis. A sample calculation worksheet has been provided in Appendix E-1.

This expense is located at “Transportation” in the company’s general ledger.

2. Handling, loading and ancillary expenses

List all charges that are included in the export price and explain how they have been quantified (“**Handling, loading & ancillary expenses**”). Identify the general ledger account where the expenses are located. If the amounts have been determined using actual observations, not from a relevant account item, provide details.

The various export related ancillary costs are identified in the table at question B4, for example:

- terminal handling;
- wharfage and other port charges;
- container taxes;
- document fees and customs brokers fees;
- clearance fees;
- bank charges, letter of credit fees
- other ancillary charges.

<Answer>

Kukje has reported the actually incurred terminal handling charges, wharfage, document fees and customs brokerage fees in the “Handling & Other” field in the Australian Sales listing. Sample calculation worksheet for above mentioned charges has been provided in Conf. Appendix E-2.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

3. Credit

The cost of extending credit on export sales is not included in the amounts quantified at question B4. However, the Commission will examine whether a credit adjustment is warranted and determine the amount. Provide applicable interest rates over each month of the review period. Explain the nature of the interest rates most applicable to these export sales eg, short term borrowing in the currency concerned.

If your accounts receivable shows that the average number of collection days differs from the payment terms shown in the sales listing, *and if* export prices are influenced by this longer or shorter period, calculate the average number of collection days. See also item 4 in section E-2 below.

<Answer>

In case of L/C payment terms, the negotiation banks normally charges interest expenses to Kukje for the period from the negotiation date to customers' payment due date. Kukje has reported such interest expenses with other bank charges such as postage etc. charged by the negotiation banks as "Bank Charge" in the Australian Sales listing.

A sample worksheet for Bank Charge has been provided in Conf. Appendix E-3.

4. Packing costs

List material and labour costs associated with packing the export product. Describe how the packing method differs from sales on the domestic market, for each model. Report the amount in the listing in the column headed '**Packing**'.

<Answer>

Since there is no significant difference in packing method between export sales and domestic sales, Kukje has not reported any packing costs for both Australian sales and domestic sales.

5. Commissions

For any commissions paid in relation to the export sales to Australia:

- provide a description; and
- explain the terms and conditions that must be met.

Report the amount in the sales listing in question B-4 under the column headed "**Commissions**". Identify the general ledger account where the expense is located.

<Answer>

Since Kukje did not provide any commissions in relation to the export sales to Australia during the investigation period, this question is not applicable to Kukje.

6. Warranties, guarantees, and after sales services

List the costs incurred. Show relevant sales contracts. Show how you calculated the expenses (“**Warranty & guarantee expenses**” and “**Technical assistance & other services**”), including the basis of any allocations. Include a record of expenses incurred. Technical services include costs for the service, repair, or consultation. Where these expenses are closely related to the sales in question, an adjustment will be considered. Identify the ledger account where the expense is located.

<Answer>

Since Kukje did not provide any warranties, guarantee and after sales services in relation to the export sales to Australia during the investigation period, this question is not applicable to Kukje.

7. Other factors

There may be other factors for which an adjustment is required if the costs affect price comparability – these are identified in the column headed “**Other factors**”. For example, other variable or fixed selling expenses, including salesmen’s salaries, salesmen’s travel expenses, advertising and promotion, samples and entertainment expenses. Your consideration of questions asked at Section G, concerning domestic and export costs, would have alerted you to such other factors.

<Answer>

This question is not applicable to Kukje.

8. Currency conversions

In comparing export and domestic prices a currency conversion is required. Fluctuations in exchange rates can only be taken into account when there has been a ‘sustained’ movement during the period of review (see article 2.4.1 of the WTO Agreement). The purpose is to allow exporters 60 days to adjust export prices to reflect ‘sustained’ movements. Such a claim requires detailed information on exchange movements in your country over a long period that includes the review period.

<Answer>

Since there was no sustained movement in exchange rate during the investigation period, this question is not applicable to Kukje.

E-2 Costs associated with domestic sales

(These cost adjustments will relate to your responses made at question D-4, “**domestic sales**”)

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

The following items are not separately identified in the amounts quantified at question D-4. However you should consider whether any are applicable.

1. Physical characteristics

The adjustment recognises that differences such as quality, chemical composition, structure or design, mean that goods are not identical and the differences can be quantified in order to ensure fair comparison.

The amount of the adjustment shall be based upon the market value of the difference, but where this is not possible the adjustment shall be based upon the difference in cost plus the gross profit mark-up (ie. an amount for selling general and administrative costs (S G & A) plus profit).

The adjustment is based upon actual physical differences in the GUC being compared and upon the manufacturing cost data. Identify the physical differences between each model. State the source of your data.

<Answer>

Kukje does not claim any adjustment for physical differences for identical products. However, Kukje exported galvanized pipes(XXXXXXXXXXXXXXXXXX) to Australian market but sold black pipes(XXXXXXXXXX), Because the difference is raw material(XXXXXXXXXX), difference in manufacturing cost should be properly adjusted as the ADCOMMISSION did in original investigation.

2. Import charges and indirect taxes

If exports to Australia:

- are partially or fully exempt from internal taxes and duties that are borne by the like goods in domestic sales (or on the materials and components physically incorporated in the GUC), or
- if such internal taxes and duties have been paid and are later remitted upon exportation to Australia;

the price of like goods must be adjusted downwards by the amount of the taxes and duties.

The taxes and duties include sales, excise, turnover, value added, franchise, stamp, transfer, border, and excise taxes. Direct taxes such as corporate income tax are not included as such taxes do not apply to the transactions.

Adjustment for drawback is not made in every situation where drawback has been received. Where an adjustment for drawback is appropriate you must provide information showing the import duty borne by the domestic sales. (That is, it is not sufficient to show the drawback amount and the export sales quantity to Australia. For example, you may calculate the duty borne on domestic sales by quantifying the total amount of import duty paid and subtracting the duty refunded on exports to all countries. The difference, when divided by the domestic sales volume, is the amount of the adjustment).

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

In substantiating the drawback claim the following information is required:

- a copy of the relevant statutes/regulations authorising duty exemption or remission, translated into English;
- the amount of the duties and taxes refunded upon *exportation* and an explanation how the amounts were calculated and apportioned to the exported goods;
- an explanation as to how you calculated the amount of duty payable on imported materials is borne by the GUC sold *domestically* but is not borne by the exports to Australia;

Substitution drawback systems

Annex 3 of the WTO Agreement on Subsidies provides: “*Drawback systems can allow for the refund or drawback of import duties on inputs which are consumed in the production process of another product and where the export of this latter product contains domestic inputs having the same quality and characteristics as those substituted for the imported inputs*”

If such a scheme operates in the country of export please provide **full** details about the operation of the scheme as well as providing the information requested above.

<Answer>

Since Kukje did not pay import duties during the investigation period, it does not claim duty drawback adjustments.

3. Level of trade

Question D-4 asks you to indicate the level of trade to the domestic customer. To claim an adjustment for level of trade differences you will need to quantify the amount by which level of trade influences price.

Trade level is the level a company occupies in the distribution chain. The trade level to which that company in turn sells the GUC and the functions carried out distinguish a level of trade. Examples are producer, national distributor, regional distributor, wholesaler, retailer, end user, and original equipment manufacturer.

It may not be possible to compare export prices and domestic prices at the same level of trade. Where relevant sales of like goods at the next level of trade must be used to determine normal values an adjustment for the difference in level of trade may be required where it is shown that the difference affects price comparability.

The information needs to establish that there are real trade level differences, not merely nominal differences. Real trade level differences are characterised by a consistent pattern of price differences between the levels and by a difference in functions performed. If there is no real trade level differences all sales are treated as being at the same level of trade.

A real difference in level of trade (may be adjusted for using either of the following methods:

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

- (a) *costs arising from different functions*: the amount of the costs, expenses etc incurred by the seller in domestic sales of the like goods resulting from activities that would not be performed were the domestic sales made at the same level as that of the importer.

This requires the following information:

- a detailed description of each sales activity performed in selling to your domestic customers (for example sales personnel, travel, advertising, entertainment etc);
- the cost of carrying out these activities in respect of like goods;
- for each activity, whether your firm carries out the same activity when selling to importers in Australia;
- an explanation as to why you consider that you are entitled to a level of trade adjustment.

or

- (b) *level discount*: the amount of the discount granted to purchasers who are at the same level of trade as the importer in Australia. This is determined by an examination of price differences between the two levels of trade in the exporter's domestic market, for example sales of like goods by other vendors or sales of the same general category of goods by the exporter. For this method to be used it is important that a clear pattern of pricing be established for the differing trade levels. Such pattern is demonstrated by a general availability of the discounts to the level - isolated instances would not establish a pattern of availability.

<Answer>

Since there are no differences in selling functions performed by level of trade, Kukje does not claim any level of trade adjustments.

4. Credit

The cost of extending credit on domestic sales is not included in the amounts quantified at question D-4. However, the Commission will examine whether a credit adjustment is warranted and determine the amount. An adjustment for credit is to be made even if funds are not borrowed to finance the accounts receivable.

The interest rate on domestic sales in order of preference is:

- the rate, or average of rates, applying on actual short term borrowing's by the company; or
- the prime interest rate prevailing for commercial loans in the country for credit terms that most closely approximate the credit terms on which the sales were made; or
- such other rate considered appropriate in the circumstances.

Provide the applicable interest rate over each month of the review period.

Thus, Kukje calculated an average duration of account receivable including promissory notes for each customer.

A sample calculation worksheet is provided in Conf. **Appendix E-4**.

5. Transportation

Explain how you have quantified the amount of inland transportation associated with the domestic sales (“**Inland transportation Costs**”). Identify the general ledger account where the expense is located. If the amount has been determined from contractual arrangements, not from an account item, provide details and evidence of payment.

<Answer>

In case of “Delivered” delivery terms, Kukje has reported the relevant inland transportation expenses in the Domestic Sales listing. However, it should be noted that it is practically impossible for Kukje to trace the inland transportation expenses on a transaction-by-transaction basis. Thus, Kukje calculated monthly average transportation expenses for domestic sales based on the trucking companies’ invoice, and multiplied by the sales quantity in order to report the inland transportation expenses on a transaction-by-transaction basis.

A sample calculation worksheet has been provided in Conf. **Appendix E-5**.

6. Handling, loading and ancillary expenses

List all charges that are included in the domestic price and explain how they have been quantified (“**Handling, loading and ancillary Expenses**”). Identify the general ledger account where the expense is located. If the amounts have been determined using actual observations, not from a relevant account item, provide details.

<Answer>

Since no handling, loading, and ancillary expenses were incurred during the reporting period, this question is not applicable to Kukje.

7. Packing

List material and labour costs associated with packing the domestically sold product. Describe how the packing method differs from sales on the domestic market, for each model. Report the amount in the listing in the column headed “**Packing**”.

<Answer>

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

Since there is no significant difference in packing method between export sales and domestic sales, Kukje has not reported any packing costs for both Australian sales and domestic sales.

8. Commissions

For any commissions paid in relation to the domestic sales:

- provide a description
- explain the terms and conditions that must be met.

Report the amount in the sales listing under the column headed “**Commissions**”. Identify the general ledger account where the expense is located.

<Answer>

Since no commissions were incurred in relation to goods under consideration during the reporting period, this question is not applicable to Kukje.

9. Warranties, guarantees, and after sales services

List the costs incurred. Show relevant sales contracts. Show how you calculated the expenses (“**Warranty & Guarantee expenses**” and “**Technical assistance & other services**”), including the basis of any allocations. Include a record of expenses incurred. Technical services include costs for the service, repair, or consultation. Where these expenses are closely related to the sales in question, an adjustment will be considered. Identify the ledger account where the expense is located.

<Answer>

Since no warranties, guarantees, and after sales services were provided during the reporting period, this question is not applicable to Kukje.

10. Other factors

There may be other factors for which an adjustment is required if the costs affect price comparability – these are identified in the column headed “**Other factors**”. List the factors and show how each has been quantified in per unit terms. For example:

- *inventory carrying cost*: describe how the products are stored prior to sale and show data relating to the average length of time in inventory. Indicate the interest rate used;
- *warehousing expense*: an expense incurred at the distribution point;
- *royalty and patent fees*: describe each payment as a result of production or sale, including the key terms of the agreement;
- *advertising*; and
- *bad debt*.

<Answer>

This question is not applicable to Kukje.

E-3 Other Possible Adjustment Factors

For the Commission to fully understand any other possible adjustment factors, please complete the tabs entitled 'HRC Purchases' and 'Theoretical to Actual Weight' tabs within the HSS Exporter Questionnaire – Korea– accompanying spreadsheet provided alongside this questionnaire.

<Answer>

As fully explained in the response to Questions of Section-C, Kukje does not calculate product specific cost by specification and size of pipes under its cost accounting system. Furthermore, its inventory system does not allow to trace each pipe sold to each coil purchased automatically, even though Kukje can trace each pipe sold to production record manually. This is the reason why Kukje proposed model code for price comparison analysis to be made by the ADCOMMISSION. It should be noted that Kukje used the same methodology in original investigation as well as in duty assessment process.

XXX(differences in sales transactions)

In addition, Kukje provides raw material purchase data as requested by the ADCOMMISSION to fully cooperate with this investigation as follows.

Please list all of your hot rolled coil (HRC) purchases starting from 01/01/2013 in the format shown at 'HRC Purchases' tab.

Please also provide a table with the format shown at 'Theoretical to Actual Weight' tab listing the theoretical weights and actual weights of all the products sold both domestically and sold to Australia during the review period.

Provide the completed spreadsheets in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

The below table provides information as to what is meant by each column heading within the 'HRC Purchases' tab.

Column Heading	Explanation
HRC Material Code	The raw material code of the HRC in your accounting and/or MRP systems for this HRC thickness - grade combination
Date of purchase	Purchase date of HRC. Please start list all HRC purchases from 1/1/2013
Supplier name	Name of HRC supplier. If purchased from a distributor rather than the manufacturer, write the distributor's name.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

Domestic Purchase or Import?	Indicate whether it was purchased locally or imported
Supplier's Invoice No	Indicate the supplier's invoice number. If your accounting system do not keep track of the suppliers invoice number, put your order number or a similar unique identifier from your accounting system
Grade of HRC	Indicate the grade of the HRC purchased. If more than one grades are bought in one order, separate HRC's with respect to their grades and thicknesses.
Theoretical Weight of Quantity Purchased (tonnes)	The theoretical weight of HRC purchased
Actual Weight of Quantity Purchased (tonnes)	The actual weight of HRC purchased
Nominal Thickness (mm)	Nominal thickness of HRC purchased
Actual Thickness (mm)	Actual thickness of HRC purchased
Currency	The currency of the invoice
Price per Tonne	Purchase price per tonne
Total Price	Total invoice price for the grade and thickness of HRC
Delivery terms	Indicate the delivery terms i.e FIS, ex-Factory etc.
Additional purchase costs (e.g. Inland transport)	Indicate any additional costs incurred with this purchase like inland delivery costs. If the costs are incurred for a group of products purchased, distribute the cost per line in a meaningful way like according to their weight.

<Answer>

Please find the attached computer file “HRC Purchase listing” in **xxxxxxx** accompanying this response, which lists all purchase of raw materials made during the period from January 1, 2013 to June 30, 2014 on a transaction by transaction basis. It should be noted that Kukje included all purchase of raw materials even though certain materials are exclusively used for the production of non-subject goods in this review.

The sample print-out of “HRC Purchase Listing” has been provided in Conf. Appendix E-6. The field layout of “HRC Purchase Listing “ including a complete description, has been provided in Conf. **Appendix E-6-1**.

As explained already, Kukje exported general **xxxxxx** pipes (AS/NZS 1163) C250/C350 only to Australian market. The comparable general **xxxxxx** pipes sold in the domestic market include AS/NZS 1163, **xxxxxxxxxxxxxxxxxxxxxx**.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

For the production of the vast majority of general [REDACTED] pipes (AS/NZS 1163) C250/C350, ASTM A500-Grade B, JIS G-3444 / KSD-3566– 400 and JIS G-3466 / KS D-3568– 400), hot coils of common grades [REDACTED] (including mini-mill coils) are used. In addition, for the production of grade 290 pipes, hot coils of [REDACTED] and [REDACTED] is used and for grade [REDACTED], hot coils of [REDACTED].

Even though hot coil price of grade [REDACTED] are slightly higher than common grade hot coils, Kukje did not separate model code for model comparison on a conservative basis.

And the table provides information as to what is meant by each column heading within the 'Theoretical to Actual Weight' tab.

Column Heading	Explanation
Product Code	The code of product
Theoretical Weight	Theoretical weight of this product
Actual (Target) Weight	Actual weight of this product
Product Standard	The standard the product manufactured to. Insert "Commercial" for commercial (non-standard) products.

<Answer>

As explained already, because all domestic sales of the comparable general [REDACTED] pipes are made on [REDACTED] and there is no concept of [REDACTED] in the domestic market. Accordingly, the above table is applicable for export sales to Australia only.

Because Kukje provided the above information in export sales listing in Appendix B-2 on a transaction by transaction basis, please refer to the sales listing.

E-4 Duplication

In calculating the amount of the adjustments you must ensure that there is no duplication.

For example:

- adjustments for level of trade, quantity or other discounts may overlap, or
- calculation of the amount of the difference for level of trade may be based upon selling expenses such as salesperson's salaries, promotion expenses, commissions, and travel expenses.

Separate adjustment items must avoid duplication.

An adjustment for quantities may not be granted unless the effect on prices for quantity differences is identified and separated from the effect on prices for level of trade differences.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

<Answer>

Kukje does not have duplicate adjustment in this response.

SECTION F – THIRD COUNTRY EXPORTS

Your response to this part of the questionnaire may be used by the Commission to select sales to a third country that may be suitable for comparison with exports to Australia.

Sales to third countries may be used as the basis for normal value in certain circumstances. The Commission may seek more detailed information on particular third country sales where such sales are likely to be used as the basis for determining normal value.

F-1 Complete the spreadsheet entitled ‘**Third country sales**’ within the *HSS Exporter Questionnaire – Korea– accompanying spreadsheet* provided alongside this questionnaire.

This spreadsheet is to list **all export sales of like goods** (i.e. transaction by transaction) to countries other than Australia in the review period (do not include non-GUC items).

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

The below table provides information as to what is meant by each column heading within the spreadsheet.

Column heading	Explanation
Country	Name of the country that you exported like goods to over the review period.
Number of customers	The number of different customers that your company has sold like goods to in the third country over the review period.
Level of trade	The level of trade that you export like goods to in the third country.
Quantity	Indicate quantity, in units, exported to the third country over the review period.
Unit of quantity	Show unit of quantity eg kg
Value of sales	Show net sales value to all customers in third country over the review period
Currency	Currency in which you have expressed data in column SALES
Payment terms	Typical payment terms with customer(s) in the country eg. 60 days=60 etc
Shipment terms	Typical shipment terms to customers in the third country eg CIF, FOB, ex-factory, DDP etc.

<Answer>

Please find the computer file “Third Country” on the **XXXXXXXXXXXXXX** this response, which lists all of the export sales of GUC to Third country on a transaction-by-transaction basis during the period of assessment.

F-2 Please identify any differences in sales to third countries which may affect their comparison to export sales to Australia.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

<Answer>

There are no differences in sales to third countries which may affect their comparison to export sales to Australia.

SECTION G – COSTS AND CONSTRUCTED NORMAL VALUE

The information that you supply in response to this section of the questionnaire will be used for various purposes including: testing the profitability of sales of like goods on the domestic market;

- *determining a constructed normal value of the GUC - i.e. of the GUC exported to Australia; and*
- *making certain adjustments to the normal value.*

You will need to provide the cost of production of both the exported goods (GUC) and for the like goods sold on the domestic market. You will also need to provide the selling, general, and administration costs relating to goods sold on the domestic market; the finance expenses; and any other expenses (eg. non-operating expenses not included elsewhere) associated with the GUC.

In your response please include a worksheet showing how the selling, general, and administration expenses; the finance expenses; and any other expenses have been calculated.

If, in response to question B4 (Sales to Australia, Export Price) you:

- *reported that the date of sale is not the invoice date and consider that this alternative date should be used when comparing domestic and export prices, and*
- *provided information on domestic selling prices for a matching period as required in the introduction to Section D (Domestic Sales)*

you must provide cost data over the same period as these sales even if doing so means that such cost data predates the commencement of the review period.

At any verification meeting you must be prepared to reconcile the costs shown to the accounting records used to prepare the financial statements.

G-1. Production process and capacity

1. Describe the production process for the GUC. Provide a flowchart of the process. Include details of all products manufactured using the same production facilities as those used for the GUC. Also specify all scrap or by-products that result from producing the GUC.

<Answer>

A brief description of the production process for the GUC is as follows;

Slitting: The production process for the GUC begins with various coil (such as hot-rolled coil, cold-rolled coil, pre-galvanized coil etc.), the primary raw material, which Kukje purchases from unaffiliated foreign and domestic suppliers. Because the coil is generally supplied with fairly broad widths, the first stage in the production process is slitting. The coil is uncoiled and passed through a slitting machine which cuts off the rough edges on both sides of the coil and slits the coil into two or more strips that are referred to in the industry as “skelp.” At the opposite end of the slitting line, the skelp is recoiled.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

Welding: The second stage is the welding (or forming) stage. Skelp of the appropriate grade and dimensions is fed into the tubing line where it passes through a series of rollers that bend the skelp to form a tube shape. An electric-resistance welding device along the production line welds a seam to close the tube as the pipe passes through. A cutting device then trims the “bead” which forms along the welded seam to create a smooth surface for the pipe. The pipe is then passed through a series of rollers that “size” the pipe. Finally, before leaving the tubing line, the pipe is cut to predetermined lengths and the ends will be faced and chamfered to remove sharp edges.

Testing and Finishing: This stage of the production process consists of various testing and finishing operations. The pipe designated by the customer is hydrostatically and ultrasonically tested as required by the specifications. The pipe may additionally be threaded and/or a coupling may be added.

A flowchart of the production process is provided in Conf. Appendix G-1.

Kukje’s production process for the GUC generates off-grade pipe, defective pipe and scrap. Off-grade and defective pipe are generally identified in the last stage of production and scrap is generated at each production process.
XXXXXXXXXXXXXXXXXXXX

- 2. Complete the spreadsheet entitled ‘**Production**’ within the *HSS Exporter Questionnaire – Korea– accompanying spreadsheet* provided alongside this questionnaire.

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

<Answer>

The spreadsheet requested in this question is provided in **XXXXXXX**. And the print-out is provided in Conf. Appendix G-2.

G-2. Cost accounting practices

- 1. Outline the management accounting system that you maintain and explain how that cost accounting information is reconciled to your audited financial statements.

<Answer>

Kukje uses a process cost accounting system. The cost accounting system is an integral part of Kukje’s financial accounting system used to prepare the company’s audited financial statements. A flowchart of the cost accounting system is provided in Conf. Appendix G-3.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

However, Kukje’s normal cost accounting system cannot account for specific cost of each product by usage application and size as discussed already because of the following reasons:

First, Kukje calculate annual cost only and does not calculate monthly nor quarterly cost in the normal course of business.

Second, Kukje calculates the raw material cost by the coil’s grade (such as HR, HGI, PO etc.) without considering the specification of the coil. Rather, Kukje considers all the skelp has the same unit price regardless of the coil’s grade.

Third, Kukje does not accumulate fabrication cost by cost centres but assigns pre-determined fabrication cost per quantity for slitting process and allocates remaining fabrication cost for welding process based on production quantity.

Fourth, Kukje does not calculate the cost of painted pipe separately. Rather, the paint costs are allocated to non-painted products. Also, outside processing cost for re-drawing and paintings is allocated to all product without distinguishing painting and re-drawing pipe

Consequently, all kinds of pipe made by Kukje have the same unit fabrication cost. Also, costs for the painted pipe and re-drawing pipe are not separately calculated. Therefore, Kukje developed more reasonable cost calculation methodology for the preparation of the response to this questionnaire as discussed below.

First, Kukje recalculated the quarterly cost to meet the requirement of the Exporter Questionnaire, based on cost information used for the preparation of Kukje’s financial statements.

XXXXXXXXXXXXXXXXXXXXXXX (Costing basis outline)

Third, the fabrication costs of Kukje are re-classified by each cost centres (welding, painting and re-drawing) and accumulated cost in welding process was allocated to each products based on production quantity on a quarterly basis.

Fourth, Kukje allocated accumulated painting material cost to painted pipe based on production quantity of painted pipe. And, outside processing cost for re-drawing was allocated to re-drawn pipe based on quantity re-drawn.

Fifth, **XXXXXXXXXXXXXXXXXXXXXXX**(Accounting treatment Scrap)

Using above described methods, Kukje recalculated the products’ cost by usage application, surface finish and end finish.

Because Kukje used the same cost information of its financial accounting system, the cost of manufacturing in the response can be reconciled to the financial statements.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

2. Is your company's cost accounting system based on standard (budgeted) costs? State whether standard costs were used in your responses to this questionnaire. If they were state whether all variances (ie differences between standard and actual production costs) have been allocated to the GUC - and describe how those variances have been allocated.

<Answer>

Kukje's cost accounting system is not based on standard costs. No standard costs were used in this response.

3. Provide details of any significant or unusual cost variances that occurred during the review period.

<Answer>

Kukje's cost accounting system is not based on standard costs; this question is not applicable.

4. Describe the profit/cost centres in your company's cost accounting system.

<Answer>

As explained above, Kukje does not maintain separate profit/cost centres because Kukje produces steel pipe only.

5. For each profit/cost centre describe in detail the methods that your company normally uses to allocate costs to the GUC. In particular specify how, and over what period, expenses are amortised or depreciated, and how allowances are made for capital expenditures and other development costs.

<Answer>

Please see the response to question G-2-4 above.

6. Describe the level of product specificity (models, grades etc) that your company's cost accounting system records production costs.

<Answer>

As explained in the response of question G-2-1, Kukje's cost accounting system does not specify each product's cost, so Kukje recalculates the products' cost by the usage application, surface finish and end finish.

7. List and explain all production costs incurred by your company which are valued differently for cost accounting purposes than for financial accounting purposes.

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

<Answer>

There is no production cost which is valued differently for cost accounting purposes than for financial accounting purposes.

8. State whether your company engaged in any start-up operations in relation to the GUC. Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.

<Answer>

Kukje did not engage in any start-up operations in relation to the GUC.

9. State the total cost of the start-up operation and the way that your company has treated the costs of the start-up operation in its accounting records.

<Answer>

Kukje did not engage in any start-up operations in relation to the GUC.

G-3 Cost to make and sell on domestic market

This information is relevant to testing whether domestic sales are in the ordinary course of trade.²

1. Complete the spreadsheet entitled '**Domestic CTMS**' within the *HSS Exporter Questionnaire – Korea – accompanying spreadsheet* provided alongside this questionnaire.

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

In doing so, provide the **actual unit cost** to make and sell **each model/type** (identified in Section C) of the like goods sold on the domestic market.

Provide this cost data for each quarter over the review period. If your company calculates costs monthly, provide monthly costs.

Indicate the source of cost information (account numbers etc) and/or methods used to allocate cost to the GUC. Provide documentation and worksheets supporting your calculations.

If you are unable to supply this information in this format, please contact the Case Manager for this review at the address shown on the cover of this questionnaire.

Please specify unit of currency.

² The Commission applies the tests set out in s.269TAA of the *Customs Act 1901* to determine whether goods are in ordinary course of trade. These provisions reflect the WTO Anti-Dumping Agreement – see Article 2.2.1.

<Answer>

The showing table of “Domestic CTMS” is provided in Conf. Appendix G-4. Also, worksheets for “Cost to Sell” are provided in Conf. Appendix G-6.

G-4 Cost to make and sell GUC (Australian exports)

Complete the spreadsheet entitled ‘**Australian CTMS**’ within the *HSS Exporter Questionnaire – Korea– accompanying spreadsheet* provided alongside this questionnaire.

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

In doing so, provide the **actual unit cost** to make and sell **each model/type** (identified in Section C) of the like goods sold on the domestic market.

Provide this cost data for each quarter over the review period. If your company calculates costs monthly, provide monthly costs.

Indicate the source of cost information (account numbers etc) and/or methods used to allocate cost to the GUC. Provide documentation and worksheets supporting your calculations.

If you are unable to supply this information in this format, please contact the Case Manager for this review at the address shown on the cover of this questionnaire.

Please specify unit of currency.

The information is relevant to calculating the normal values based on costs. It is also relevant to calculating certain adjustments to the normal value.

<Answer>

The showing table of “Australian CTMS” is provided in Conf. Appendix G-5. Also, worksheets for “Cost to Sell” are provided in Conf. Appendix G-6.

G-5 Where there are cost differences between goods sold to the domestic market and those sold for export, give reasons and supporting evidence for these differences.

<Answer>

There is no cost difference between goods sold to the domestic market and those sold for export, except for delivery cost, which is separately calculated.

G-6 Give details and an explanation of any significant differences between the costs shown, and the costs as normally determined in accordance with your general accounting system. Reference should be made to any differences arising from movements in inventory levels and variances arising under standard costing methods.

<Answer>

There were no differences arising from movements in inventory levels and variances arising under standard costing method. As noted in Question 3 of G-3, Kukje does not use standard costing methods.

G-7 In calculating the unit cost to make and sell, provide an explanation if the allocation method used (eg number, or weight etc) to determine the unit cost differs from the prior practice of your company.

<Answer>

As mentioned above, Kukje recalculated the CTMS for this XXXXXXXXXXXXXX case.

G-8 Major raw material costs:

List major raw material costs, which individually account for 10% or more of the total production cost.

For these major inputs:

- identify materials sourced in-house and from associated entities;
- identify the supplier; and
- show the basis of valuing the major raw materials in the costs of production you have shown for the GUC (eg market prices, transfer prices, or actual cost of production).

Where the major input is produced by an associate of your company the Commission will compare your purchase price to a normal market price. If the associate provides information on the cost of production for that input such cost data may also be considered.

Normal market price is taken to be the price normally available in the market (having regard to market size, whether the input is normally purchased at 'spot prices' or under long term contracts etc).

The term associate is defined in section 269TAA of the Act. Included in that definition are companies controlled by the same parent company (a company that controls 5% or more of the shares of another is taken to be an associated company); companies controlled by the other company; and companies having the same person in the board of directors.

If the major input is purchased or supplied from an integrated production process you should provide detailed information on the full costs of production of that input.

<Answer>

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

The primary raw material used in the manufacture of the GUC is steel coil such as H/R coils, C/R coils, EGI coils, HGI coils and P/O coils. All of them are purchased from non-affiliated suppliers, therefore this question is not applicable to Kukje.

SECTION H – EXPORTER/PRODUCER’S DECLARATION

I hereby declare that.....(company)
did, during the period of review export the GUC and have completed the
attached questionnaire and, having made due inquiry, certify that the
information contained in this submission is complete and correct to the best of
my knowledge and belief.

or

I hereby declare that.....(company)
did, during the period of review, produce the GUC which were exported to
Australia by another company and have completed the attached questionnaire
and, having made due inquiry, certify that the information contained in this
submission is complete and correct to the best of my knowledge and belief.

Name :.....

Signature :.....

**Position in
Company** :.....

Date :.....

PUBLIC RECORD VERSION-KUKJE STEEL-KOREA

SECTION J - CHECKLIST

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A – general information	
Section B – export price	
Section C – like goods	
Section D – domestic price	
Section E – fair comparison	
Section F – exports to third countries	
Section G – costing information	
Section H – declaration	

Electronic Data	Please tick if you have provided spreadsheet
INCOME STATEMENT	
TURNOVER – sales summary	
AUSTRALIAN SALES – list of sales to Australia	
LIKE GOODS – comparison of goods sold domestically and exported to Australia	
DOMESTIC SALES – list of all domestic sales of like goods	
HRC PURCHASES – list of all HRC purchases from 1/1/2013	
THEORETICAL to ACTUAL – theoretical weight to actual weight conversion table	
THIRD COUNTRY – sales to other countries	
PRODUCTION – production summary	
DOMESTIC COSTS – costs of goods sold domestically	
DOMESTIC COSTS – costs of goods sold domestically	
AUSTRALIAN COSTS – costs of goods sold to Australia	
INCOME TAX – income tax summary	