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6 August 2015

Mr Justin Wickes  
Director, Operations 9  
Anti-Dumping Commission  
Level 5  
224 Bunda Street  
Canberra ACT 2601

Dear Mr Wickes

**Application for exemption from anti-dumping measures – Hi-Vis Signs and Safety (Exemption Case No. 42)**

I refer to the application made on behalf of Hi-Vis Signs and Safety ("Hi-Vis") seeking an exemption from IDD and ICD measures applicable to certain hollow structural sections ("HSS") exported from the People's Republic of China ("China").

It is claimed in the application that the grounds for the exemption request are that the goods are "linked" to TCO 9508551 which reads as follows:

" 7306.30.00 TUBES, cold drawn, welded to specification DIN 2393, having both of the following:

- (a) carbon content NOT less than 0.06% and NOT greater than 0.4% by weight;
- (b) outside diameter NOT less than 6.4mm and NOT greater than 203.2mm.

Op. 28.06.95 Dec. date 29.09.95 – TC 9508551."

The TCO description refers to cold drawn tubes. Cold drawn tube is precision tube that is drawn through a die (or rollers) with or without a mandrel to reduce the diameter of the tube and thereby enhance the mechanical properties and achieve tight dimensional tolerances.

An examination of the website of the supplier to Hi-Vis, Tianjin Qunshengda Steel Pipe Co., Ltd (refer [www.tjqsd.com](http://www.tjqsd.com)) confirms that the producer does not list cold drawing as a capability and does not offer cold drawn pipe for sale.

As the goods do not meet the description of the TCO (as the goods need to be cold drawn to qualify) and the measures apply to HSS that is made from hot rolled coil, it is likely that the imported galvanised pipe from Tianjin Qunshengda Steel Pipe Co. Ltd is HSS made from hot rolled coil and is correctly covered by the measures.

If you have any further questions concerning this letter please do not hesitate to contact me on (07) 3909 6130.

Yours sincerely

A handwritten signature in black ink, appearing to read "B Willcox", with a stylized flourish extending to the right.

Brett Willcox  
Manager – Strategy and Business Planning