

22 December 2014

Mr. Chris Harrison
Operations 2
Anti-Dumping Commission
1010 La Trobe Street
Docklands Victoria 3008

Email: operations2@adcommission.gov.au

Public File

Dear Mr. Harrison

Review of measures inquiries – Hollow Structural Sections exported from P R China and Korea

I refer to Anti-Dumping Notices ("ADN") No 2014/93 and 2014/94 in respect of:

- (i) the review of anti-dumping measures on certain hollow structural sections ("HSS") exported from P R China by Tianjin Youfa Steel Pipe Group Co., Ltd ("Tianjin Youfa"); and
- (ii) the review of anti-dumping measures on certain hollow structural sections ("HSS") exported from Korea by Kukje Steel Co., Ltd ("Kukje Steel").

Orrcon Operations Pty Ltd ("Orrcon") is an Australian manufacturer of the goods the subject of the review applications. Orrcon is a wholly-owned subsidiary company of BlueScope Steel Limited. Orrcon is an interested party in both review investigations and seeks to provide information to the Anti-Dumping Commission ("the Commission") to assist in the review.


By letters dated 12 November, the Commission requested financial information from Orrcon in respect of the like goods manufactured by Orrcon over the investigation period 1 July 2013 to 30 June 2014. Orrcon has prepared the required financial information in the approved Appendix A6.1 format for the investigation period.

The Confidential financial data is attached for your consideration.

In your letter of 12 November 2014 you referenced that the financial data would be considered for the purposes of establishing an Unsuppressed Selling Price ("USP") and Non-Injurious Price ("NIP"). Orrcon considers that an appropriate USP involves the same methodology as applied in Report No. 177 – that is, the Australian industry's cost-to-make-and-sell plus a level of profit. Orrcon considers that this methodology remains suitable as a basis for a USP and subsequent NIP calculation for the current review investigations.

If you have any questions concerning this letter and the attached financial information, please do not hesitate to contact Mr. Alan Gibbs on (02) 4275 3859 at BlueScope or Orrcon's consultant Mr. John O'Connor on (07) 3342 1921.

Yours sincerely


per
Leon Andrewartha
Managing Director