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22 December 2014

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

Email: operations2@adcommission.gov.au

Public File

Dear Mr Harrison

Review of anti-dumping measures – Certain Hollow Structural Sections exported from P R China and Korea

I refer to the review investigations involving certain hollow structural sections (“HSS”) exported to Australia from the People’s Republic of China (“China”) by Tianjin Youfa Steel Pipe Group Co., Ltd (“Youfa Steel”) of China and Kukje Steel Co., Ltd (“Kukje Steel”) of Korea.

The reviews were announced in ADN No. 2014/93 and 2014/94 respectively.

A submission dated 10 November 2014 has previously been supplied by Austube Mills Pty Ltd (“ATM”) to the Anti-Dumping Commission (“the Commission”) in respect of these review investigations.

ATM would like to take this opportunity to comment on a proposed Unsuppressed Selling Price (“USP”) and Non-Injurious price (“NIP”) for the purposes of the review inquiries. In Report No. 177 the Australian Customs and Border Protection Service (“ACBPS”) determined a USP based upon the Australian industry’s cost-to-make-and-sell (“CTM&S”) plus an amount for profit. The level of profit was determined based upon the industry’s profit over the three quarters of the 2008 year.

ATM submits that a USP for the review investigations should not alter from the ACBPS’ methodology as detailed in Report No. 177. That is, the Australian industry’s CTM&S in the current investigation period (i.e. 1 July 2013 to 30 June 2014) plus the industry profit in 2008 is considered a reasonable basis for determining a USP for the Australian industry unaffected from dumping.

If you have any questions concerning this letter, please do not hesitate to contact Mr Brett Willcox (07) 3909 6130 or Mr John O’Connor on (07) 3342 1921.

Yours sincerely

A handwritten signature in black ink, appearing to read 'B Willcox', with a long horizontal flourish extending to the right.

Brett Willcox
Manager – Strategy and Business Planning