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3 June 2014

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commercial+international

**The Director  
Operations 1  
Anti-Dumping Commission  
Level 5 Customs House  
5 Constitution Ave  
Canberra  
Australian Capital Territory 2601**

Attention: **Mr Rod Jones**

By email

Dear Director

## **Habaş Sinai ve Tibbi Gazlar Istihsal Endüstrisi A.Ş. Rod in coils exported from Indonesia, Taiwan and Turkey**

We refer to the letter from Habaş Sinai ve Tibbi Gazlar Istihsal Endüstrisi A.Ş. ("Habaş") authorising us to act on its behalf in this matter, forwarded to you under separate cover a short while ago.

The reason for this letter is that Habaş contacted us late yesterday evening with an urgent request for our advice and assistance in finalising its Exporter Questionnaire ("EQ") response and in having it properly presented and lodged with the Commission. For that purpose, Habaş asks for a few more days to complete those tasks.

I have reviewed the company's previous request for an extension of time, and have discussed the circumstances further with them overnight. The company initially requested an extension until 10 June. This was to enable the company officials involved and their financial consultant to finalise the EQ response following the completion of a sales and cost verification in an antidumping investigation underway by the United States Department of Commerce concerning reinforced steel bar. My investigation of the circumstances suggests that this was a genuine pre-estimate of the time the company thought it would need.

The truth of the matter is that the relevant people are all presently fully occupied in that verification, which is taking place on-site at this very moment. As you know such verifications are lengthy, laborious and time intensive processes, involving full attention to the questions and explanations required by the verifiers during business hours, and then continuing and significant work after hours to prepare the further information and justifications requested by the verifiers.

The company has asked us to please request three more days in order for it to complete its EQ response. Accordingly, we very sincerely - and we believe very realistically - ask you to further consider the special and difficult circumstances that Habaş faces at this present time.

We note that a Taiwanese exporter has been allowed an extension until Friday 6 June 2014. We have reviewed the reasons offered by that company for its requested extension. We believe the period afforded

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to it was entirely reasonable in view of those reasons, but at the same time we also believe that the extenuating circumstances facing Habaş are even more compelling than those reasons. Despite that, our client only seeks an extension to the same date, namely 6 June 2014.

We are cognisant of the needs of the investigation. Our client is also cognisant of the investigation stages and time periods, and we believe that its appointment of a financial consultant and now also ourselves to assist them is a demonstration of its earnest attention and commitment to this matter.


We are also cognisant of the position which applies under Article 6.1.1 of the WTO *Anti-Dumping Agreement*, which is that:

*Exporters or foreign producers receiving questionnaires used in an anti-dumping investigation shall be given at least 30 days for reply. Due consideration should be given to any request for an extension of the 30 day period and, upon cause shown, such an extension should be granted whenever practicable. [footnote omitted]*

We ask the Commission to consider that it is practicable to allow an additional three days to Habaş.

This letter is non-confidential and may be placed on the public record of this investigation.

Yours sincerely

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

**Daniel Moulis**  
Principal