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3 December 2015

The Commissioner
Anti-Dumping Commission
Level 35, 55 Collins Street
MELBOURNE VICTORIA 3000

For Public File

Dear Sir/Madam

Investigation No. 285 – Review of Anti-Dumping Measures Relating To Dalian Steelforce Hi-Tech Co Ltd

I refer to the File Note (Folio No, 22) recently placed on the Public File concerning “Data Used For Raw Material Benchmark Indexation” in Investigation No. 285.

As an Australian manufacturer of Hollow Structural Sections (“HSS”) AusTube Mills Pty Ltd (“ATM”) is an interested party to review investigation No. 285.

ATM has reviewed the proposed methodology for benchmarking hot rolled coil prices in China. Specifically, the Commission proposes to use the average of the ‘high’ and ‘low’ domestic prices of HRC (denominated in US dollars) in Korea and Taiwan as reported by MEPS (International) Ltd (“MEPS”), a reputable provider of steel price data.

ATM agrees with the proposed benchmark methodology nominated by the Commission. Prevailing domestic prices for HRC in Korea and Taiwan are reflective of prices incurred in purchasing HRC by HSS manufacturers in the respective countries, and are considered market prices appropriate for use in a benchmark study.

If you have any further questions concerning this letter please do not hesitate to contact me on (07) 3909 6130 or ATM’s representative John O’Connor on (07) 3342 1921.

Yours sincerely

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

Brett Willcox
Manager – Operations and Support Services