

# KUKJE STEEL CO. , LTD

461-11, SEOKYO-DONG, MAPO-GU, SEOUL, KOREA

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## PUBLIC VERSION

24 November 2015

Operations 2  
Anti-Dumping Commission  
Level 35, 55 Collins Street  
Melbourne VIC 3000  
Australia

Dear Commissioner,

Kukje Steel Co Ltd (hereafter referred to as "Kukje") is a producer of hollow structural sections which are manufactured from hot rolled coil purchased locally in Korea. Kukje makes this submission following the Anti-Dumping Commission's (hereafter referred to as "the Commission") invitation for interested parties to submit views on the use of data sourced from MEPS (International) Ltd (hereafter referred to as "MEPS").

Kukje makes the following statements.

1. Kukje understands that the Commission is considering the use of subscription based published hot rolled coil data sourced from MEPS as a measure of representative domestic hot rolled coil prices in Korea and Taiwan as a replacement of hot rolled coil costs for certain exporters.
2. In order to preserve the confidentiality of Kukje's costing information submitted to the Commission during the most recent review of hollow structural sections from Korea (case no. 266) and XXXX XXXX XXXXX XXXX XXXX XXXXXX XXXXX XXX, Kukje respectfully requests that the Commission not rely solely on its hot rolled coil costs as replacement . To do so would likely result in those exporters being familiar with Kukje's hot rolled coil costs, which are the primary cost element in the production of hollow structural sections.
3. Kukje does not have access to the relevant MEPS data, however to assist the Commission in assessing whether the MEPS data is a reasonable and reliable indicator of domestic hot rolled coil costs in Korea, Kukje consents to the data it has previously provided being used to evaluate the reliability of MEPS.

Kukje hopes that this information will be useful to the Commission's considerations, and repeats its request that its costing information be treated confidentially at all times.

Yours sincerely

DO AM KANG / PRESIDENT

  
PRESIDENT