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**FURTHER REQUEST FOR ADDITIONAL INFORMATION – ZHEJIANG YUELING**

**1. For finished goods that are partially-processed using other providers, please advise:**

- The names of the companies that undertake the additional finishing work.

**Answer:**

**During the POR, [Confidential] companies undertook the additional finish treatment; please refer the company name as follows:**

<b>SN</b>	<b>Company Name</b>
<b>1</b>	<b>[Confidential]</b>
<b>2</b>	<b>[Confidential]</b>
<b>3</b>	<b>[Confidential]</b>
<b>4</b>	<b>[Confidential]</b>
<b>5</b>	<b>[Confidential]</b>
<b>6</b>	<b>[Confidential]</b>
<b>7</b>	<b>[Confidential]</b>
<b>8</b>	<b>[Confidential]</b>
<b>9</b>	<b>[Confidential]</b>
<b>10</b>	<b>[Confidential]</b>

*[Name of consigned processing company]*

*This information is not susceptible to a meaningful non-confidential summary as it is commercially sensitive. Since disclosure of such information will harm the Company's interests, it was provided to the Service in confidence.*

- Whether these companies are related to Yueling.

**Answer:**

**These companies are [Confidential]**

*[Nature and activities of consigned processing company]*

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- Whether these companies are responsible for any role in the sale of finished products to domestic customers, or the exportation of the finished products to Australia. Specifically, for Australian sales, can you please confirm:
  - Whether the companies that undertake these finishing activities are aware of who the final customer is.

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- Whether the companies that undertake these finishing activities are responsible for any aspect of the physical exportation of the goods to Australia (e.g. for arranging shipping of the goods to Australia).

**Answer:**

**These companies are response for finish treatment and doesn't involved in [Confidential]**

**Yueling provide a consigned processing contract for reference; please see Exhibit-1 [Confidential].**

*[Consigned processing contract]*

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*Note that in the event that the Commission determines that Yueling is the exporter of these goods, we will need to receive a CTMS that includes all costs of manufacture (that is, both the costs incurred by Yueling and any companies undertaking finishing work), by product type (that is, the "surface processing" types as shown in the domestic and export sales spreadsheets).*

*This information would be used to develop a dumping margin, as it forms part of our Ordinary Course of Trade tests, as well as a basis for developing a constructed normal value (should the Commission need to construct normal values for this review).*

- 2. The company submitted a CTMS spreadsheet which was specified as being for 'domestic sales'. Please confirm whether the company's CTM for export sales is the same as domestic sales.**

*Note that if we construct normal values as part of this review, the Commission requires the cost to make of the exported goods.*

**Answer:**

**Yueling's CTM for export sales is [Confidential].**

*[Cost]*

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- 3. Please provide further explanation around export sales channels as submitted in the company's Exporter Questionnaire (Exhibit B-2a).**

- The company advised that there are 3 sales channels for Australian sales:
  - direct sales to independent clients;

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**Answer:**

**[Confidential]**

*[Sales activities to Australia]*

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- sales through using either domestic exporters; and

**Answer:**

**[Confidential]**

*[Sales activities to Australia]*

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- overseas resellers.

**Answer:**

**[Confidential]**

*[Sales activities to Australia]*

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- The Commission understands that **[Confidential]** purchased goods off a domestic exporter – as identified in the export sales spreadsheet. The Commission further understands that this is the only company that purchased goods off a domestic exporter.
  - Please confirm whether this understanding is correct.

**Answer:**

**[Confidential]**

*[Sales activities to Australia]*

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- Please advise whether additional costs are incurred as part of using that trader in order to sell goods to Australian companies. If so, please allocate these costs against relevant transactions in the Australian sales spreadsheet (and/or provide us with some sort of information that explains what these costs are by quarter and unit).
  - *Note that the Commission will need understand what those costs are to ensure these costs are included as an adjustment to normal values.*

**Answer:**

**[Confidential]**

*[Sales activities to Australia]*

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- The Commission was unable to identify in the Australian sales spreadsheet any sales that occurred via *overseas resellers*.
  - Please provide names and locations for, and explain Yueling's relationship with, these 'overseas resellers'.

**Answer:**

**[Confidential].**

*[Exporter's information]*

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- Please explain the independent Australian customers that purchase Yueling's goods via these 'overseas resellers'.

**Answer:**

**Actually, for these exports [Confidential] involved in, the Australian customer is [Confidential].**

*[Name of Australian customer]*

*This information is not susceptible to a meaningful non-confidential summary as it is commercially sensitive. Since disclosure of such information will harm the Company's interests, it was provided to the Service in confidence.*

- Please explain the 'overseas reseller's' role in the export sales and distribution process.

**Answer:**

**Please refer to response to question 3.**

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- Please advise whether the use of a reseller adds any costs to export sales to Australia, or whether the reseller is responsible for paying Yueling for the goods (before on-selling to the Australian independent customer).
  - If the use of an overseas reseller does add costs to Australian sales, please ensure that these costs are allocated against relevant sales in the Australian sales spreadsheet (or are advised through some means in your response).
  - If the overseas reseller is responsible for paying Yueling for the goods before on-selling to Australia, please ensure that an additional spreadsheet is submitted showing prices paid by the reseller to Yueling per Australian sales transaction (in a similar format to the spreadsheet showing sales via a domestic exporter to **[Confidential]**).

**Answer:**

**[Confidential]**

*[Sales activities to Australia]*

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*Note: It is possible that if sales did occur via Australian resellers, those resellers may be considered by the Commission as "the importer" for the purpose of this review. Alternatively, overseas resellers located in other countries could be treated as "traders". Hence the Commission needs to understand if overseas resellers were involved in Australian sales.*

4. **Submit source documents (invoices, proof of payment, packaging lists, and where appropriate bills of lading and customs declarations) for the Australian sales transactions listed at Attachment A.**

**Answer:**

Please refer to **Exhibit 4.1 to Exhibit 4.6 [Confidential]** for requisite information.

*[Sales documents]*

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5. **Advise, for each of the new subsidy programs identified at Attachment B, what aspect of the company's work contributed towards its eligibility for these new programs.**

- In relation to the "**[Confidential]**", please confirm whether aluminium road wheels sold to Australia were the subject of the trade remedy investigation through which this benefit was sought, or whether this related to any other products.

**Answer:**

**[Confidential]**

*[Subsidy Programme]*

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- For all other programs, explain whether benefits were received solely or in part because the company was producing aluminium road wheels that were exported to Australia.

**Answer:**

**[Confidential]**

*[Subsidy Programme]*

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**Attachment A – selected Australian sales**

Invoice number	Customer	Date
<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>
<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>
<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>
<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>
<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>
<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>

*[Sales documents]*

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**Attachment B – new subsidy programs**

<b>Program name</b>	<b>Administrative organisation</b>	<b>Subsidy type</b>	<b>Eligibility requirements</b>	<b>Company's work that contributed to eligibility</b>
<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>
<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>
<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>
<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>
<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>
<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>
<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>	<i>[Confidential]</i>

*[Subsidy Programme]*

*This information is not susceptible to a meaningful non-confidential summary as it is commercially sensitive. Since disclosure of such information will harm the Company's interests, it was provided to the Service in confidence.*



**ADDITIONAL INFORMATION REQUEST**

1. Please confirm there are **[Confidential]** sales included the Australian sales and domestic sales spreadsheets?
  - a. We understand that **[Confidential]** are not the goods under consideration and were not included in the dumping margins calculated as part of the 2012 initial investigation into aluminium road wheels (ARWs).

**Answer:**

**[Confidential]** in Australian sales and domestic sales spreadsheets.

**Yueling [Confidential] in Table B-4.1[Confidential] , Table B-4.2[Confidential] and Table D-4[Confidential] .**

*[Product sold in POR]*

*This information is not susceptible to a meaningful non-confidential summary as it is commercially sensitive. Since disclosure of such information will harm the Company's interests, it was provided to the Service in confidence.*

2. Can you confirm that sales to **[Confidential]** are the only sales that are occurring **[Confidential]**?
  - a. If there are additional Australian customers that purchase their goods **[Confidential]**, please:
    - i. Explain the respective roles of **[Confidential]** in the sales and distribution process.
    - ii. Submit a new spreadsheet which shows the prices as paid by the **[Confidential]** for exported goods.

**Answer:**

**[Confidential]**

*[Exportation channel]*

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3. We note that in the CTM spreadsheet, Yueling has proposed allocating manufacturing costs **[Confidential]**, but in the export sales spreadsheets **[Confidential]** is not included. In order to complete our dumping margins, we need to compare CTMS with domestic and export sales, using the same method of allocation. We cannot use **[Confidential]** to determine export prices and normal values, and kilograms to determine CTMS.
  - a. If you would like us to determine export prices and normal values by kilogram rather than piece, please advise why you would like to do so, and resubmit the domestic and export sales spreadsheets with a 'weight' column included.

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- b. If the Commission views that it has not received sufficient information on which to determine dumping margins by weight rather than piece, it will need to determine dumping margins based on pieces.

**Answer:**

Yueling supplement the weight column in domestic sales spreadsheets (Table D-4 [Confidential]) and export sales spreadsheets (Table B-4.1 [Confidential] and Table B-4.2 [Confidential]), [Confidential]. [Confidential].

With regard to calculation of dumping margins, Yueling claims it is necessary to take into account [Confidential]

*[Quantity of product under consideration]*

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- 4. In relation to the CTMS spreadsheet (G-4.2) please advise:
  - a. What product types fall under the "[Confidential]" products category.
    - i. I note that the domestic sales spreadsheet shows the company [Confidential]. Do those products all fall under the "[Confidential]" category?
    - ii. If the above products do not come under the [Confidential] category, would it be possible to resubmit CTMS data for those specific products?

**Answer:**

The [Confidential] of Table G-4.2 [Confidential] refers to these products, after production in Yueling, where [Confidential]. Yueling uses [Confidential]. For these products, you will find their costs were the total of [Confidential]. For this purpose, the finished product name were shown on the table header, which includes [Confidential].

Please note Yueling do not sell [Confidential].

*[Description of product under consideration]*

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- b. Why [Confidential] goods don't have unit SG&A allocated.

**Answer:**

Actually, Yueling did report unit SG&A for these products, [Confidential].

**We revise and re-submit the Table G-4.2 [Confidential] without formula.**

*[SG&A]*

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5. For the subsidy programs **[Confidential]** (Attachment A), could you please advise (if known):
- The legislation under which these subsidies operate; and
  - Eligibility requirements to access these subsidies.

**Answer:**

**[Confidential]**

**As Yueling understood, any company satisfied requirements could be granted these subsidies. Please refer to Appendix-A [Confidential] for specific eligibility.**

**Yueling noted that these programmes are not listed in PART I-2 of CVD questionnaire (SECTION-I) and original investigation, as Yueling understood, these programmes should not subject to this review.**

*[Subsidy programs]*

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