



NON – CONFIDENTIAL

22 April 2015

Received on 22/04/2015

Mr Bora Akdeniz
Manager
Anti-Dumping Commission
GPO Box 1632
Melbourne VIC 3001

Dear Mr Akdeniz,

HSS FROM THAILAND – PACIFIC PIPE PUBLIC CO LTD

This letter, on behalf of Pacific Pipe Public Co Ltd (“Pacific Pipe”), addresses the upward adjustment made to Pacific Pipe’s domestic prices of like goods in your normal value calculation of their exports of standard AS1163 grades C350 and C350LO square (SHS) and rectangular (RHS) pipe.

Pacific Pipe’s documents provided to you during 31 March – 16 April 2015 demonstrate that all standards/grades of like goods sold in the domestic market, ie pipe for general structural purposes, are produced from generally the same HRC used to produce the AS1163-C350/C350LO pipe exported to Australia.

It is the tensile strength required by finished products which determines the HRC grade required for their production. The minimum tensile strength of AS1163-C350/C350LO is 430MPa and the minimum tensile strengths of the like goods sold in the domestic market during the IP are as follows:

Standard

[REDACTED]

Tensile strength (MPa)

[REDACTED]

You will see from the Pacific Pipe documents provided that the standard/grade of the like goods sold in the domestic market have little impact on their selling price. Differences in the domestic selling prices of like goods are more attributable to factors other than standard/grade, eg shape, finish, thickness, volume.

In addition to the matter of the effect of standard/grade on the comparison of export prices of AS1163-C350/C350LO and domestic prices of like goods, the documents provided to you

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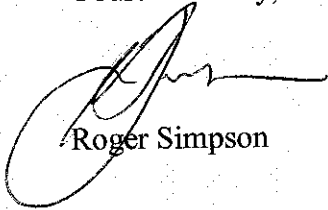
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during 31 March – 16 April also demonstrate that almost all of Pacific Pipe's domestic sales of natural and painted finish, square, rectangular and circular pipe are in the ordinary course of trade ("OCOT") and are therefore suitable for use in s269TAC(1) normal value assessments.

Consequent upon the foregoing, we expect your early revision of the normal values and dumping margin used for the purpose of the PAD.

Yours sincerely,



Roger Simpson