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PUBLIC RECORD

18 January 2016

Case Manager
Operations 2
Anti-Dumping Commission
55 Collins Street
Melbourne VIC 3000

By e-mail: operations2@adcommission.gov.au

Dear Sir/Madam

Re: Review of Measures Inquiry No. 285 – Submission by Kukje Steel Co., Ltd

I refer to the submission by Kukje Steel Co Ltd ("Kukje") concerning the appropriate benchmark hot rolled coil price to be included in the constructed normal value for Dalian Steelforce co., Ltd of China (Review Inquiry No. 285).

Kukje has expressed its concern that the Anti-Dumping Commission ("the Commission") may be contemplating using Kukje's hot rolled coil ("HRC") costs as verified in review inquiry No. 266.

Austube Mills ('ATM') supports the concerns raised by Kukje. As HRC accounts for a significant proportion of the production cost for Hollow structural sections ("HSS") the use of Kukje's HRC could potentially disclose confidential costing information (to an international competitor). For this reason, ATM supports the Commission's intended approach to utilise domestic pricing information sourced from the industry publication MEPS (International) Ltd ("MEPS").

MEPS is a recognised industry publication that provides access to domestic pricing information on a subscription basis. To avoid the potential disclosure of Kukje's confidential costing information, ATM encourages the Commission to rely upon the published MEPS domestic HRC pricing for the investigation period in Review Inquiry No. 285.

If you have any questions concerning this letter please do not hesitate to contact me on (07) 3909 6130.

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