

**Responses on SEF263 –REVIEW INTO ANTI-DUMPING MEASURES
ALUMINIUM ROAD WHEELS EXPORTED FROM THE PEOPLE’S REPUBLIC
OF CHINA:**

Zhejiang Jinfei Kaida Wheel Co., Ltd.

Via Email: Danielle.Rudolph@adcommission.gov.au

Operations 2

Anti-Dumping Commission

Dear Sir/Madam,

Regarding to Statement of Essential Facts Number 263 (SEF263) in relation to the above review dated on 15 September 2014, we are requesting to change the method of dumping calculation for Zhejiang Jinfei Kaida Wheel Co., Ltd. We provide two different kinds of method as follows:

1. The first method refers to attachment JINFEI-1(CONFIDENTIAL) in which all changes were labelled as yellow.
Firstly, when calculating profit rate of domestic sales, we suggest uplift the cost of aluminium with 14% into domestic CTMS, as well as constructing normal value. It is fairly comparable to take the uplift of aluminium cost into consideration both in calculating profit rate of domestic sales and constructing normal value. Taking the product of Painted 13(Qtr 1) for example, when constructing the normal value, the Commission added aluminium cost of RMB10.66, then UPLIFTED WA EXPORT CTM(including the uplift aluminium cost of RMB10.66) multiplied by the grand profit rate of 27.85% made RMB149.87 as Constructed normal value EXW. According to the method used by the Commission, the profit rate of 27.85% was calculated without uplifting aluminium cost. However, when constructing the normal value, the profit includes two parts, the actual cost and uplifted aluminium cost, $(106.44+10.66)*27.85\%$. So, the profit was doubled in the normal value.
Secondly, when constructing normal value, we suggest use individual profit rate of each product type, i.e., Chrome 17, Chrome 18, Painted 13, Painted 14, other than the grand total profit rate since each product type has its individual cost and profit rate. It is more reasonable to use the precise cost and profit data other than the grand total profit data, and also, it is easy to calculate the normal value by using individual profit rate. In this way, Jinfei's dumping margin should be 3.85%. We strongly suggest to use this method.
2. The second method refers to attachment JINFEI-2(CONFIDENTIAL) in which all changes were labelled as yellow. In this method, the uplift of aluminium cost was not considered when calculating the profit rate of domestic sales. At least, we suggest use individual profit rate of each product type, i.e., Chrome 17, Chrome

18, Painted 13, Painted 14, other than the grand total profit rate when constructing normal value, since each product type has its individual cost and profit rate. It is more reasonable to use the precise cost and profit data other than the grand total profit data, and also, it is easy to calculate the normal value by using individual profit rate. In this way, Jinfei's dumping margin should be 7.91%.