

14 August 2015

Director Operation4
Anti-Dumping Commission
PO Box 1632
MELBOURNE VIC 3001
AUSTRALIA

Dear Director,

Statement of Essential Facts (“SEF 263”)

This submission is made on behalf of Pilotdoer Wheel Co.,Ltd (“Pilotdoer”) and in response to the Anti-Dumping Commission’s (the Commission) preliminary findings outlined in Statement of Essential Facts Report No. 263 (“SEF 263”).

This submission is a supplementary comment in relation to the approach the Commission used to calculate the uplifted raw material rate in dumping part and determine benefits from program 1 in countervailing part.

In the Commission’s dumping margin calculation of SEF 263, the Commission calculated the uplifted raw material rate, based on Pilotdoer’s all aluminum purchase compared with benchmark price, and this is also used to determine the benefit from program 1 in the Commission’s subsidy margin calculation.

Pilotdoer considers that the aluminum suppliers [REDACTED] **【Company Name】**, [REDACTED] **【Company Name】** and [REDACTED] **【Company Name】** are not SOEs or SIEs, and they are not influenced by the GOC, the Commission should exclude the purchases from these companies when calculating the uplifted raw material rate and determining the benefit from program1.

In regard to the company nature, Pilotdoer did some research as below:

- [REDACTED] **【Company Name】** is a public company listed on Shanghai Stock Exchange (“SSE”), the stock code is [REDACTED], the company’s information can be searched from SSE’s website¹. Pilotdoer download the company’s annual report of year 2014, please refer to the Exhibit: [REDACTED] 2014 Annual Report, at the page 29 of the report (refer to Exhibit: Page 29 of [REDACTED] 2014 Annual Report), **【Company Name】** [REDACTED] disclosed its top 10 shareholders, in accordance with the nature of shareholder, it sufficiently proved that the company **【Company Name】** [REDACTED] is not a SOE or SIE.

¹ [http://static.sse.com.cn/disclosure/listedinfo/announcement/c/2015-03-30/\[REDACTED\]_2014_n.pdf](http://static.sse.com.cn/disclosure/listedinfo/announcement/c/2015-03-30/[REDACTED]_2014_n.pdf)

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- 【Company Name】 [REDACTED] is 100% owned by a company named 【Company Name】 [REDACTED], and 【Company Name】 [REDACTED] is a public company listed on SSE, the stock code is [REDACTED], 【Company Name】 [REDACTED] information can be searched from SEE's website². Pilotdoer download the company's annual report of year 2014, please refer to the Exhibit: [REDACTED] 2014 Annual Report, at the page 64-65 of the report (refer to Exhibit: Page 64-65 of [REDACTED] 2014 Annual Report), 【Company Name】 [REDACTED] disclosed its subsidiaries information, that sufficiently proved that 【Company Name】 [REDACTED] is 100% owned by 【Company Name】 [REDACTED]. Also at the page 70 of the report (refer to Exhibit: Page 70 of [REDACTED] 2014 Annual Report), 【Company Name】 [REDACTED] disclosed its parent company information, that indicated 【Company Name】 [REDACTED] is ultimately controlled by 【Company Name】 [REDACTED] and two natural person. Based on above, it sufficiently proved that the company 【Company Name】 [REDACTED] is not a SOE or SIE.

 - 【Company Name】 [REDACTED] is a little company, not a public company, it's difficult to search detailed information about it, but from the company scale, Pilotdoer considers that 【Company Name】 [REDACTED] should be a private enterprise, not a SOE or SIE.

In conclusion, Pilotdoer respectfully but firmly request the Commission to exclude the purchases from above non-state-owned enterprises or non-state-investment enterprises when calculating the uplifted raw material rate and determining the benefit from program1.

Yours sincerely,

Paul Chao

²[http://static.sse.com.cn/disclosure/listedinfo/announcement/c/2015-04-17/\[REDACTED\]_20150418_21.pdf](http://static.sse.com.cn/disclosure/listedinfo/announcement/c/2015-04-17/[REDACTED]_20150418_21.pdf)