



**J.BRACIC & ASSOCIATES**  
TRADE REMEDY ADVISORS

PO Box 3026  
Manuka, 2603 ACT  
Mobile: +61 499 056 729  
Email: [john@jbracic.com.au](mailto:john@jbracic.com.au)  
Web: [www.jbracic.com.au](http://www.jbracic.com.au)  
ABN: 18 168 927 820

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6 March 2015

Director Operations 1  
Anti-Dumping Commission  
1010 La Trobe Street  
Melbourne VIC 3008

### **Dumping investigation – Rod in coils exported from Indonesia**

Dear Director,

This submission is made by PT Gunung Raja Paksi (GRP) in response to the Anti-Dumping Commission's (the Commission) Statement of Essential Facts (SEF) Report No. 240 published on 2 March 2015.

#### **Errors in GRP's dumping calculations**

GRP wishes to highlight the following errors in the Commission's preliminary dumping margin calculations.

##### Export price

Following consideration of GRP's submission of 23 December 2014, the SEF report outlines a change in the Commission's approach to establishing the date of sale from the order date to the invoice date. This change in approach ensures consistency with its stated policy and practice.

However on review of the GRP dumping margin calculations, it is noted that the invoice date was only used for the purposes of establishing normal values and was not used to establish relevant export prices. Specifically, certain export transactions which were invoiced in [REDACTED] appear to continue to be recorded as occurring in [REDACTED] on the basis of the order date.

Given the Commission's acknowledgment in the SEF that the invoice date would typically best reflect the date of sale, unless evidence is presented which demonstrates that the material terms of sale are established on an alternative date, GRP requests the Commission to correctly attribute exports to periods based on the invoice date.

##### Normal value

GRP notes that the decision to base normal values on the invoice date of domestic sales has resulted in [REDACTED] [Summary – GRP’s profit performance]. A review of the dumping margin calculations shows that the quarterly unit normal value [REDACTED] [Summary – domestic pricing information] appears to have been manually entered rather than referenced to the correct adjusted normal value [REDACTED] [Summary – domestic pricing information] .

Yours sincerely

John Bracic