

30 June 2014

Mr Adam Yacono
Manager
Anti-Dumping Commission
Customs House
1010 La Trobe Street
DOCKLANDS VICTORIA 3008

By email: operations3@adcommission.gov.au

Dear Adam

Public record for dumping investigation - case 223

We refer to submission 067 uploaded to the above electronic public record on 25 June 2014, being a redacted version of "Benchmarking Report" submitted by One Steel Manufacturing Pty Ltd (OSM).

Obviously Tung Ho cannot verify such an unsubstantiated and heavily redacted document. However, we make the following comments on Tung Ho's behalf:-

- We don't understand why the Author's name has been redacted, which raises our doubts regarding credibility and/or independence of the report;
- There appears to be no certification of source of material. There is a section of the "Benchmarking Report" titled "Identification", but this has been redacted, which we are left to assume addresses compliance with standard in relation roll mark and labels etc., not certification of source;
- The report is dated March 2011 (outside the investigation period), and does not identify date of manufacture, HEAT source etc., however evidently significantly before March 2011; and
- Although "Benchmarking Report" and actual production date of material is most definitely outside the investigation period, are OSM willing to provide Tung Ho exact production data of material tested, for Tung Ho to verify against actual production and dispatch data retained by Tung Ho?



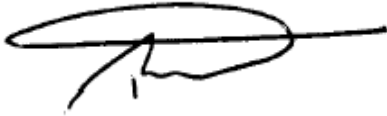
Conclusion

- a. The report and subject material it relates to, is outside the investigation period;
- b. The report is unsubstantiated or certified and lacks credibility and/or independence;
- c. The report outcome of “benchmarking” does not reflect outcome of actual production data from investigation period, which has been verified by ADC verification team;
- d. The report outcome of “benchmarking” does not reflect Tung Ho’s own production management policies & practices (i.e. manufacture to actual weight rather than accepted theoretical tolerances); and
- e. Tung Ho remain concerned regarding implications of accusations from “benchmarking report” on Tung Ho’s manufacturing reputation and deem data provided to date, inadequate to substantiate OSM’s defamatory representations. Tung Ho reserve the right to pursue this matter further.

Should you require any additional information, please contact the writer.

This letter is non-confidential and can be placed on the public record for this case.

Yours faithfully



Troy Morrow

