

Importer Questionnaire
Response of Electra Cables (Aust.) Pty Limited



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**ELECTRIC CABLES EXPORTED TO AUSTRALIA FROM THE PEOPLE'S
REPUBLIC OF CHINA**

This questionnaire seeks information in relation to your imports and sales of certain electric cables. The information you provide will be used to establish export prices, to construct the Australian market for the goods, and in an assessment of the applicants' claims.

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|---------------|--|---|
| Part A | Company and overseas supplier information | Please advise contact details (including an email address) for exporters as soon as possible |
| Part B | Imports and forward orders | Return by 19 October 2011 |
| Part C | Sales and expenses | Return by 19 October 2011 |

Return address

Mail: Director Operations 1
International Trade Remedies Branch
Australian Customs and Border Protection Service
5 Constitution Avenue
CANBERRA ACT 2600

Facsimile: 02 6275 6990

E-mail: tmops1@customs.gov.au

Part A - Company and overseas supplier information**1. Your company**

Company Name	Electra Cables (Aust) Pty Limited ("Electra")
ABN:	38 056 024 385
Contact name:	Mr Adam Chen
Position:	Director
Mailing address:	PO Box 2084 Smithfield NSW 2164
Telephone:	(02) 8786-5200
Facsimile:	(02) 8786-5288
E-mail address:	adam.chen@electracables.com.au

Please contact our representatives for the purposes of this investigation, Moulis Legal, with all inquiries in the first instance.

Provide details on the ownership of your company and major shareholders.

The shareholders of Electra are [CONFIDENTIAL TEXT DELETED - details of shareholding of private companies].

Describe the role of your company in the Australian market for the goods - for example, buying or selling agent, importer/distributor, importer/wholesaler or importer/retailer.

Electra is an importer and distributor of the goods under consideration. In some cases electric cable does require cutting into lengths and rewinding on cable reels. This does not happen as often in the case of basic cable, such as the goods under consideration, as compared to other cable. Breaking bulk and sorting also takes place in the warehouse.

At what level of trade is each of your customers - for example, distributor, wholesaler or retailer?

All of Electra's customers in relation to the goods under consideration are wholesalers. The major buying groups are listed in the table below

Customer	Level of trade
[CONFIDENTIAL TEXT DELETED - names of customers and their level of trade]	

2. Your overseas supplier/s of the goods

Commodity	Electric cables
Grade(s)(if applicable)	[CONFIDENTIAL TEXT DELETED - model codes of cable produced by supplier]

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Company:	Guilin International Wire and Cable Group Co., Ltd.
Contact name:	[CONFIDENTIAL TEXT DELETED – names of individuals and contact details of supplier]
Position:	
Mailing address:	
Telephone:	
Facsimile:	
E-mail address:	

Commodity	Electric cables
Grade(s)(if applicable)	[CONFIDENTIAL TEXT DELETED – model codes of cable produced by supplier]
Company:	Guilin Xianglong Wire and Cable Co., Ltd.
Contact name:	[CONFIDENTIAL TEXT DELETED – names of individuals and contact details of supplier]
Position:	
Mailing address:	
Telephone:	
Facsimile:	
E-mail address:	

Commodity	Electric cables
Grade(s)(if applicable)	[CONFIDENTIAL TEXT DELETED – model codes of cable produced by supplier]
Company:	Guilin Fellong Wire and Cable Co., Ltd.
Contact name:	[CONFIDENTIAL TEXT DELETED – names of individuals and contact details of supplier]
Position:	
Mailing address:	
Telephone:	
Facsimile:	
E-mail address:	

Commodity	Electric cables
Grade(s)(if applicable)	[CONFIDENTIAL TEXT DELETED – model codes of cable produced by supplier]
Company:	Aoning Electric Cables Co., Ltd.
Contact name:	[CONFIDENTIAL TEXT DELETED – names of individuals and contact details of supplier]
Position:	
Mailing address:	
Telephone:	
Facsimile:	
E-mail address:	

3. Overseas manufacturer/s of the goods [if different from overseas supplier]

The abovementioned manufacturers of the goods are considered by Electra to be the exporters of the goods.

4. Timing of proposed visit by Customs and Border Protection

Customs and Border Protection would like to undertake visits to importers between **19 October and 4 November 2011**. Can you please advise what dates are suitable for the Customs and Border Protection visit? Please note that it may be helpful to consider the availability of key staff, such as your accountant, purchasing officer or sales staff.

Electra notes that the visit to Electra by Customs has been scheduled for **Monday 7 November 2011**.

Address for proposed visit:

Street address:	1/13 Cooper Street Smithfield NSW 2164
Telephone:	02 8786 5200
Facsimile:	02 8786 5288

PART B - Imports and forward orders**1. The goods under investigation**

The goods under consideration are single and multi-core cables insulated with polymeric materials intended for use in electric installations at working voltages up to and including 1 kV with the following characteristics:

- suitable for connection to mains power supply; and
- comply with Australian Standards AS/NZS 5000.1 or AS/NZS 5000.2.

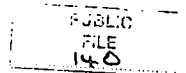
The goods under consideration fall into the following categories:

- flat cables, insulated and sheathed, with two cores and earth and with conductor area up to three square millimetres;
- building wire, insulated, unsheathed, single core and with conductor area from two to three square millimetres; and
- single core double insulated cable, insulated and sheathed and with conductor area from 12 to 60 square millimetres.

The goods are classified to the tariff subheading 8544.49.20 (statistical codes 40 and 41) of Schedule 3 to the Customs Tariff Act 1995. The general rate of duty is currently 5%. Imports from China are subject to the Developing Country Status duty rate of 4%.

2. Identification of Imports of electric cables under investigation from China

Customs and Border Protection will shortly provide you with a list of your imports for electric cables exported in the period 1 July 2010 to 30 June 2011. When received, please confirm whether the shipments are the goods and the quantities and value are correct.



Electra has received the list of imports for electric cables in the period of 1 July 2010 to 30 June 2011. All the shipments were imported by Electra and relate to goods under consideration. It is considered that almost all of the import entries are correct, although some errors in quantity and value have been discovered.

Please complete the "Part B – cost to import and sell" spreadsheet with details for each selected shipment. Customs and Border Protection will advise you which shipments have been selected for this more detailed examination. (Please note that you cannot complete this part of the questionnaire until Customs and Border Protection provides you with the respective listing of your imports.)

See attached spreadsheet entitled *Electra IQ B2 - Selected shipments*. Electra would like to mention the following about this spreadsheet:

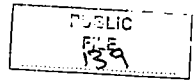
- The shipment in each case has been considered to be all of the goods in the shipment. In all cases the goods under consideration were only some of the goods in the shipment concerned.
- The SG&A percentage is derived directly from Electra's financial accounts and has not been adjusted downwards to account for any differences pertaining to the goods under consideration.
- The exchange gain percentage only relates to trading and has also been derived directly from Electra's accounts.
- The average selling price is not available on a per shipment basis. Instead Electra has used the average per unit selling price for all sales in the month after the month of shipment. The model mix involved in the comparison between shipment cost and selling price is not the same.
- The average selling price is unrebated, in that the models in any particular shipment would be sold to different customers and therefore different rebate levels could be expected.
- Because of the different cost and sales basis, Electra has not completed the "Profit per KM" and "Profitability (%)" rows.

The multiple models, GUC/non-GUC mix, the [CONFIDENTIAL TEXT DELETED – number of invoices] invoices and about [CONFIDENTIAL TEXT DELETED – number of lines in invoices] lines in those invoices, combined with the different assumptions as to costs for certain models, customer rebates, and cable lengths make it difficult to absolutely and precisely isolate prices and costs. Electra enjoyed strong profitability in the POI and looks forward to further demonstrating its financial data and having it verified as Customs may request.

3. Documents required at the Customs and Border Protection visit

For the selected shipments, please prepare copies of the commercial invoice, bill of lading, packing list, and any other documents supporting post exportation costs including:

- overseas freight and insurance;
- Customs duties;
- landing and wharfage charges;
- freight forwarding fees;
- cartage/delivery fees; and
- any other charges between the FOB point and the landed, duty paid into-store point.



It would be appreciated if these documents could be assembled into one bundle for each shipment and copies provided to Customs and Border Protection at the visit.

Electra notes and understands this requirement.

4. Forward orders

Please provide details of any forward orders for electric cables.

This has not yet been compiled, for which Electra apologises. It will be provided as soon as can be arranged. It is not a major task but the question was overlooked in the course of assembling the other data.

PART C - Sales and expenses

1. Your Sales

Please provide details of *all* your sales of electric cables in the Australian market for the period **1 July 2010 to 30 June 2011**. Preferably this will be a download from your sales data into an EXCEL spreadsheet and will include the following information.

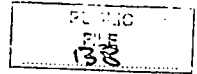
- o customer name;
- o customer address;
- o customer level of trade (distributor, end user etc);
- o supplier;
- o purchase order number to supplier;
- o country of origin;
- o invoice number;
- o invoice date;
- o delivery terms (eg. FIS, ex-warehouse);
- o credit terms (days);
- o model or grade;
- o quantity;
- o packing;
- o total invoiced price;
- o unit invoiced price;
- o off invoice discount/rebate amount (if applicable, list each type of discount/rebate individually); and
- o net unit sales price.

If your financial system does not readily provide the above information, please raise this matter with the case manager.

See attached spreadsheets entitled *Electra IQ C1 - Sales*.

Electra has provided details of all its sales of electric cables in the Australian market for the period 1 July 2010 to 30 June 2011. This is a download from Electra's sales data into .xls spreadsheets on a month by month basis (12 spreadsheets).

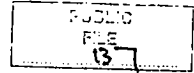
Electra has a large number of invoices. For example, in the month of July 2010 the total number of invoices raised was [CONFIDENTIAL TEXT DELETED - number of invoices]. Additionally any one invoice can include many different model units.



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The downloaded sales history data has been organised quickly in the most practically feasible way. Most items of information as listed above are included, with the following exceptions:

1. Customer level of trade - this information is not shown in the downloaded invoice listing level. [CONFIDENTIAL TEXT DELETED - level of trade]
2. Supplier - this information is not shown in the download invoice listing level. All goods are supplied by the four suppliers listed in Part A of this Importer Questionnaire response.
3. Purchaser order number to supplier - this information is not shown in the downloaded invoice listing level. All goods supplied to Electra's customers in Australia are shipped from Electra's warehouses in Sydney, Melbourne and Brisbane.
4. Country of origin - this information is not shown in the downloaded invoice listing level. All goods originate in and are imported from China.
5. Delivery terms - this information is not shown in the downloaded invoice listing level. All sales are FIS (free into customer store), except for a small number of sales that are collected by the customers ex-warehouse.
6. Credit terms - this information is not shown in the downloaded invoice listing level. Credit terms range from [CONFIDENTIAL TEXT DELETED - credit arrangements with customers].
7. Model or grade - this information is not shown in the downloaded invoice listing level. Each invoice contains one to multiple models (product types). Each month, Electra has about [CONFIDENTIAL TEXT DELETED - number of invoices] invoices. Electra would need to download or print out each invoice to show the models, or write a program to support the extraction of this data. Selected invoices can be provided.
8. Quantity - this information is not shown in the download of invoice listing level. Each invoice contains one to multiple models (product types). Each model has an associated quantity in the concerned invoice. Each month, Electra has about [CONFIDENTIAL TEXT DELETED - number of invoices] invoices. Electra would need to download or print out each invoice to show the models, or write a program to support the extraction of this data. Selected invoices can be provided.
9. Packing - this information is not shown in Electra's system. Goods are normally packed on pallets. Pallet sizes are full, half and quarter, depending upon the quantity of individual sales orders/invoices in the shipment.
10. Unit invoice price - this information is not shown in the download of invoice listing level. Each invoice contains one to multiple models (product types). Each model has an associated quantity in the concerned invoice. Each month, Electra has about [CONFIDENTIAL TEXT DELETED - number of invoices] invoices. Electra would need to download or print out each invoice to show the models and associated prices, or write a program to support the extraction of this data. Selected invoices can be provided.
11. Invoice discount /rebate amount - this information is not shown in the download of invoice listing level. In general, this information is provided in later



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reconciliation advices. Information can be extracted and calculated on a separate worksheet.

12. Net unit sales price - this information is not shown in the download of invoice listing level. Each invoice contains one to multiple models (product types). Each model has an associated net price in the invoice concerned. Each month, Electra has about [CONFIDENTIAL TEXT DELETED - number of invoices] invoices. Electra would need to download or print out each invoice to show the models and associated prices, or write a program to support the extraction of this data. Selected invoices can be provided.

Electra is ready to respond to the reasonable requirements that Customs may have for the purposes of analysis and verification.

The column headings used in the sales spreadsheets can be further explained as follows:

Inv No	Invoice number (generated by Electra Cables accounting software system in sequential order)
Slrs Ord	Delivery docket number (generated by Electra Cables accounting software system)
Date	Date invoice raised
Account	Customer account code
Cust Ref	Customer's purchase order number
Br	State where customer is located
PCode	Post code of the customer
Inv Amount	The total amount invoiced to the customer incl GST
ExGst Amt	The total amount invoiced to the customer excl GST
Name	Customer name (includes branches of multi-branch customers such as buying groups, and independent wholesaler customers)
Adr 1	PO Box/street address of customer
Adr 2	Name of suburb

2. **Selling, general and administration (SG&A) expenses**

Please calculate the SG&A costs for imported electric cables for the period 1 July 2010 to 30 June 2011.

These expenses are normally derived from profit and loss statements or other management records and are typically expressed as a percentage of sales revenue. Where electric cables are only a part of overall company sales, allocations of SG&A expenses may have to be made.



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Customs and Border Protection will seek to verify your sales data and your estimate of SG&A expenses at the importer visit.

Electra notes that It has included an SG&A percentage in the *Electra IQ C1 - Selected shipments* spreadsheet. As noted this is not adjusted for relative costs at the individual model type level.