



The Director
Operations 3
Anti-Dumping Commission
Level 5, Customs House
5 Constitution Avenue
CANBERRA ACT 2601
Australia
Email operations3@adcommission.gov.au
Fax 1300 882 506

24 July 2014

Dumping Investigation ADC 239 – PV Modules or panels being exported from China

Dear Madam / Sir,

FRV Service Australia Pty Ltd wishes to supplement its submission.

We also wish to highlight that FRV does not consider Tindo's marketed modules to be "like product" with many modules imported from China and typically procured by local consumers and certainly modules procured by utility scale projects.

Tindo markets their Karra module, which is an AC module, it is marketed as an AC module. None of their current marketing material or their website indicates they sell anything other than their Karra module.

The Tindo Karra module generates alternating current electricity, most modules sold by Chinese manufacturers within the Australian market are direct current modules, which FRV considers are not like product.

We contend that only alternating current modules should be considered like product by the ADC in your considerations as to whether dumping has occurred and that if you find it has that Dumping Duties only be applied to alternating current generating modules.

We recognise that AC modules contain components commonly imported from China, both assembled and separately.

Further, we consider that in actively marketing alternating current modules only Tindo has not suffered material damage relating to direct current modules.

If you require further information please don't hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'S. Jackson', written over a white background.

Steve Jackson
Head of Development
FRV Services Australia Pty Ltd