

For Publication

Attention Mr Matthew Williams
The Director
Operations 3
Anti-Dumping Commission
1010 La Trobe Street
DOCKLANDS VIC 3008

20 August 2014

Dear Sir

Quenched and Tempered Steel Plate Investigation - Submission in response to initiation of anti-dumping investigation and proposed anti-dumping measures in relation to exports from Japan

As you know we act for, among others, Nippon Steel & Sumitomo Metal Corporation (NSSMC).

We understand that [REDACTED] has provided to the ADC an all sales spreadsheet specifying the usual data. We also understand that the average selling price of [REDACTED] is not lower than the relevant market price in Australia at the relevant time(s). It follows that NSSMC's products did not injure Australian industry.

NSSMC has analysed its sales data for the goods during the investigation period ending 31 December 2013. That analysis reveals that approximately:

- (a) [REDACTED] of all its exports to Australia of the goods under consideration were sold to [REDACTED].
- (b) [REDACTED] of the goods under consideration were sold to [REDACTED]
- (c) [REDACTED] were sold [REDACTED] [REDACTED].

Given that the significant bulk of our client's exports, [REDACTED] of its sales of the goods under consideration were sold [REDACTED] data is centrally relevant to any assessment of injury. In this way we would urge you to undertake the following analysis of that data:

1. [Confidential - Methodology for analysing data] [REDACTED]
[REDACTED]
 - (a) [REDACTED]
 - (b) [REDACTED]
 - (c) [REDACTED]
 - (d) [REDACTED]
2. The data should then be spliced and aggregated into quarterly periods.
3. The data should then be filtered to show [REDACTED];
4. The data should then be further filtered to show [REDACTED]
5. Thereafter a weighted average can be calculated for each quarter.

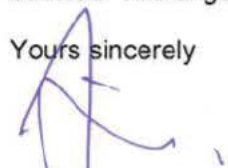
On analysis and upon proper modelling of the raw data we believe that issues of price undercutting and price suppression will not hold true.

The Director, Anti-Dumping Commission

20 August 2014

Please confirm that you will undertake the necessary modelling of the raw data [REDACTED] in accordance with or, substantially with, the above methodology. We otherwise trust that you will actively consider and engage with that information.

Yours sincerely



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