

Mr Chris Vincent
Anti-Dumping Commission
Customs House
5 Constitution Ave
CANBERRA ACT 2601

20 May 2014

NON-CONFIDENTIAL

PT. Unelec Indonesia (UNIDO) Power transformers exported from China, Indonesia, Korea, Taiwan, Thailand and Vietnam

Dear Mr Vincent,

We refer to our letter dated 11 March 2014 and our meeting on 6 May 2014. As you are aware, we act for PT. Unelec Indonesia (UNIDO) ("**Unindo**") in respect to the investigation by the Anti-Dumping Commission ("**ADC**") into certain power transformers ("**GUC**") exported from China, Indonesia, Korea, Taiwan, Thailand and Vietnam ("**Investigation**").

As foreshadowed in our previous correspondence and meeting, enclosed is an updated exporter questionnaire and attachment in respect of Unindo. The need for Unindo to lodge an updated exporter questionnaire and our comments in respect of that document are set out below.

1. The need for an updated exporter questionnaire

The original exporter questionnaire was completed in good faith by Unindo with every attempt made to provide complete and accurate information. However, post the lodgment of that questionnaire, on review it was identified that:

- certain information was based on budgeted costs and is now updated to actual costs;
- the Australian sales information did not include details of all exports to Australia during the period 1 July 2010 to 30 June 2013 ("**Investigation Period**");
- the Australian sales information included details of sales which were not exported during the investigation period;
- details of domestic sales were incomplete.

Further, greater detail has been provided in respect of some previously answered questions.

2. Export of the Goods Under Investigation to Australia

a. Timing of exports

In the original exporter questionnaire Unindo provided details of [REDACTED]

[REDACTED] We are instructed that during the Investigation Period Unindo exported [REDACTED]

[REDACTED] [Commercial-in-confidence. Confidential Australian sales and customer information.]

As set out in the original exporter questionnaire, [REDACTED] occurred after the Investigation Period or had not yet occurred. [Commercial-in-confidence. Confidential Australian sales and customer information.]

[REDACTED]
[REDACTED] [Commercial-in-confidence. Confidential Australian sales and customer information.]

The exporter questionnaire has been updated [REDACTED] in the “Australian sales” tab and the “Australian CTMS” tab. [Commercial-in-confidence. Confidential Australian sales and customer information.]

b. Information provided

We are instructed that the cost to make and sell information provided in the original exporter questionnaire was based on estimated amounts. Actual amounts are now known about the goods that have been shipped and Unindo has updated the exporter questionnaire accordingly.

Given the nature of the production, many common costs are allocated to particular jobs in accordance with [REDACTED]. [Commercial-in-confidence. Internal accounting information.]

2. Domestic sales

In the original exporter questionnaire Unindo provided details of [REDACTED] in the “Domestic Sales” tab and details of [REDACTED] in the “Domestic CTMS” tab. [Commercial-in-confidence. Confidential domestic sales information.]

During the Investigation Period, Unindo issued invoices for approximately [REDACTED]
[REDACTED]
[REDACTED] [Commercial-in-confidence. Confidential domestic sales information.]

In addition, attached is a spreadsheet with relevant details regarding all domestic sales of the GUC during the Investigation Period, including the net profit of those transactions.

Unindo is willing to provide further details in respect of any domestic transaction the ADC wishes to further investigate.

3. Provision of further information

We note that we have not received any comment on the original exporter questionnaire from the ADC or requests for further information. As such, we assume that other than the issues raised above, the information in the original exporter questionnaire was generally acceptable to the ADC. However, if the ADC has any questions regarding any information in the updated exporter questionnaire or would like any further documentation, please let us know at your earliest convenience.

Additionally, Unindo remains willing to allow the ADC to conduct a verification visit at its premises.

Please feel free to contact Russell Wiese on (03) 8650 7736 or Stephen Klotz of Norton Rose Fulbright on (02) 9330 8308 in relation to the enclosed exporter questionnaire or the Investigation generally.

Yours sincerely

Marc Bunch
Partner – Global Trade