

**Responses on SEF181 –INVESTIGATION - ALLEGED DUMPING AND  
SUBSIDISATION OF ALUMINIUM ROAD WHEELS (ARWs) FROM CHINA:  
Pilotdoer Wheel Co., Ltd.**

**Via Email: [tmops2@customs.gov.au](mailto:tmops2@customs.gov.au)**

Director Operations 2

Trade Measures Branch

Australian Customs and Border Protection Service

Dear Sir/Madam,

Regarding to Statement of Essential Facts Number 181 (SEF181) in relation to the above investigation dated on 27 April 2012, we would like to response as follows:

1. In SEF181, Australian Customs consider that normal values were established in accordance with section 269TAC(2)(c) using Pilotdoer's weighted average cost to make and sell data (revised for raw material cost uplift), by wheel diameter, and an amount for profit. And also, in the final visit report of Pilotdoer, Australian Customs are not satisfied that the cost of raw materials and labour submitted by Pilotdoer in the CTMS spreadsheets provided with the exporter questionnaire reasonably represent the actual cost to make and sell the various types of aluminium road wheels during the investigation period. Therefore, these costs should be disregarded as unreliable information pursuant to s269TAC(7) of the Act.

Since the cost information of Pilotdoer is unreliable, we consider that the normal value of other cooperating Chinese exporter should be used in determining the normal value of Pilotdoer. In this way, we use the normal value of Zhejiang Jinfei Kaida Wheel Co., Ltd as normal value of Pilotdoer. Please see the Pilotdoer-Revised DM Calcs.xls.

2. In the SEF181, Arrowcrest's market share of AM segment was always exactly stable from FY2008 to FY2011. And for the total market share, Arrowcrest was also stable from FY2008 to FY2011. Imports from China increased due to the decline of imports from other countries. For the consideration of profitability, Arrowcrest's total profit and profitability during the injury analysis period also keep stable from FY2007 to FY2011, except a loss situation in FY2009. Based on this analysis, Arrowcrest did not suffer any injury in the form of market share and profit. So, the imports from China has not caused material injury to the Australian industry.