

ARROWCREST  
GROUP

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21 May 2012

Ms. Joanne Reid  
Director, Operations 2  
International Trade Remedies Branch  
Australian Customs and Border Protection Service  
Customs House  
5 Constitution Avenue  
CANBERRA ACT 2601

Dear Joanne,

**Reference : Arrowcrest response to Hunt & Hunt submission dated 17 May 2012 on behalf of Jayco Corporation Pty Ltd in reply to SEF No. 181.**

I refer to the submission from Hunt & Hunt dated 17 May 2012, on behalf of Jayco Corporation Pty Ltd (Jayco), in respect of SEF No. 181.

Prior to Jayco's switch to ARWs on or around 2006~2007 as standard on all Jayco RV's, Jayco was supplied with 14" 4WD steel wheels manufactured by Arrowcrest at its Woodville North, South Australia steel wheel plant.

Having lost its 14" 4WD steel wheel supplies to Jayco (supplied to Jayco by tyre companies including Tyres 4U), Arrowcrest has sought to supply locally produced ARWs for Jayco.

Certainly Arrowcrest and Performance Wheels possess the necessary know-how and capability to produce ARWs of the kind imported by Jayco. The Australian industry's 4WD Recreational Vehicle (RV) ARWs have been supplied to the Australian 4WD, caravan, camper and boat trailer "recreational vehicle subset" for many more years than Jayco has fitted 4WD RV ARWs to any of its vehicles.

Arrowcrest manufactures 4WD RV ARWs in the sizes 15", 16" and 17" and had quoted unsuccessfully for supply of Jayco's 14", 15" and 16" 4WD RV ARWs in 2009 - evidence is attached herewith. However as noted in the 2009 correspondence, "(Jayco's) motive to move is price driven" and Arrowcrest has been unable to compete fairly with dumped and subsidized prices for ARWs from China.

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Arrowcrest therefore rejects Jayco's contention that there is no injury to the Australian industry in the sizes of 4WD RV ARWs imported by Jayco for the manufacture of its RVs.

Accordingly, we request Customs to include ARWs for RVs as like goods when assessing measures for ARWs from China at dumped and subsidized prices.

Yours sincerely,



Bill Davidson  
General Manager

**RE: ROH steel & alloy wheel quotation**

Bill Davidson <bill.davidson@roh.com.au>  
To: Bill Davidson <roh@roh.com.au>

Mon, May 21, 2012 at 12:25 PM

-----Original Message-----

**From:** Alex Bugeja [mailto:alex.bugeja@jayco.com.au]**Sent:** Monday, 30 March 2009 18:35**To:** Bill Davidson**Subject:** RE: ROH steel & alloy wheel quotation*Public File*

Hi Bill,

1. 14" and 15" are a long way off. (especially the 14)
2. 16" is within a bulls roar of what we are paying currently.



Our motive to move is price driven, our current suppliers quality and ability to supply has been good-to-excellent.

Regards

Alex.

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**From:** Bill Davidson [mailto:Bill.Davidson@roh.com.au]**Sent:** Saturday, 28 March 2009 10:08 AM**To:** Alex Bugeja**Subject:** RE: ROH steel & alloy wheel quotation

Hi Alex,

Would the following indicative prices be workable ?

	Annual volume	Piece price	Finished weights
14"	15,000	\$[REDACTED] + gst	6.3kg
15"	12,000	\$[REDACTED] + gst	7.3kg
16"	1,500	\$[REDACTED] + gst	8.8kg

1. The wheels would be manufactured in Adelaide. Our production MOQ would be 200 pieces per

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- run, possibly reducing your current stock exposure and assisting cash-flow.
2. Our indicative piece prices are for as-cast finishes, fully painted silver. Other preferred colours can be accommodated subject to paint and process cost.
  3. The indicative piece prices do not include a Jayco centre cap or wheel nuts but do include delivery, packed bulk on pallets without cartons to Dandenong. We can look at caps and nuts if you wish.
  4. For dealer parts and accessories, we can individually carton wheels in addition to packing the factory requirements in bulk.
  5. Tooling costs can be discussed and are not added here yet. We would aim to utilise changeover tooling to keep tooling costs to the bare minimum to achieve your preferred design. If you would like our input into the style of each wheel we can provide this via our in-house designer.
  6. Routine updating of wheel styles say every 2 years can be accommodated subject to wheel weights and tooling costs.
  7. The wheels would be fully tested in-house including radial and cornering fatigue and impact testing to the same standards that we apply to the OEM alloy wheels that we supply to Toyota, HSV, Suzuki and others. Engineering samples would be supplied and an automotive level PPAP submission would be submitted for sign-off before commencement of production.
  8. Supply would be covered by our global product liability insurance. I have attached a copy of our current certificate for the record.
  9. Local Australian manufacture offers a number of additional benefits including our immediate capacity to work with your engineers in a straightforward manner with the comfort that we have both the experience and capability to deliver on time.

We look forward to your response.

Regards,

Bill Davidson

General Manager

ROH Automotive

Direct line 08 8468 4111

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-----Original Message-----

**From:** Alex Bugeja [mailto:alex.bugeja@jayco.com.au]

**Sent:** Friday, 27 March 2009 18:16

**To:** Bill Davidson

**Subject:** RE: ROH steel & alloy wheel quotation

Hello Bill,

Confirming the steel wheel quotation is still under consideration.

Weights for alloys are as follows

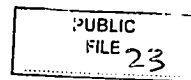
14" 6.3 kgs

15" 7.3 kgs

16" 8.8 kgs

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Regards

Alex



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Alex Bugeja

Logistics Development Manager

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**From:** Bill Davidson [mailto:Bill.Davidson@roh.com.au]

**Sent:** Thursday, 19 March 2009 9:14 AM

**To:** Alex Bugeja

**Subject:** ROH steel & alloy wheel quotation

Good morning Alex,

We have given David Mangan piece prices for 14", 15" and 16" steel wheels and await his advice regarding acceptance and supply.

For the alloy wheels, which would come from Adelaide if we can do something for you, could you please advise the weights of the alloy wheels that you are currently using? This will give me a target weight to achieve and allow me to give you a better indication of the piece prices.

Thank you,

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Bill Davidson

General Manager

ROH Automotive

Direct line 08 8468 4111

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2 attachments



image001.jpg  
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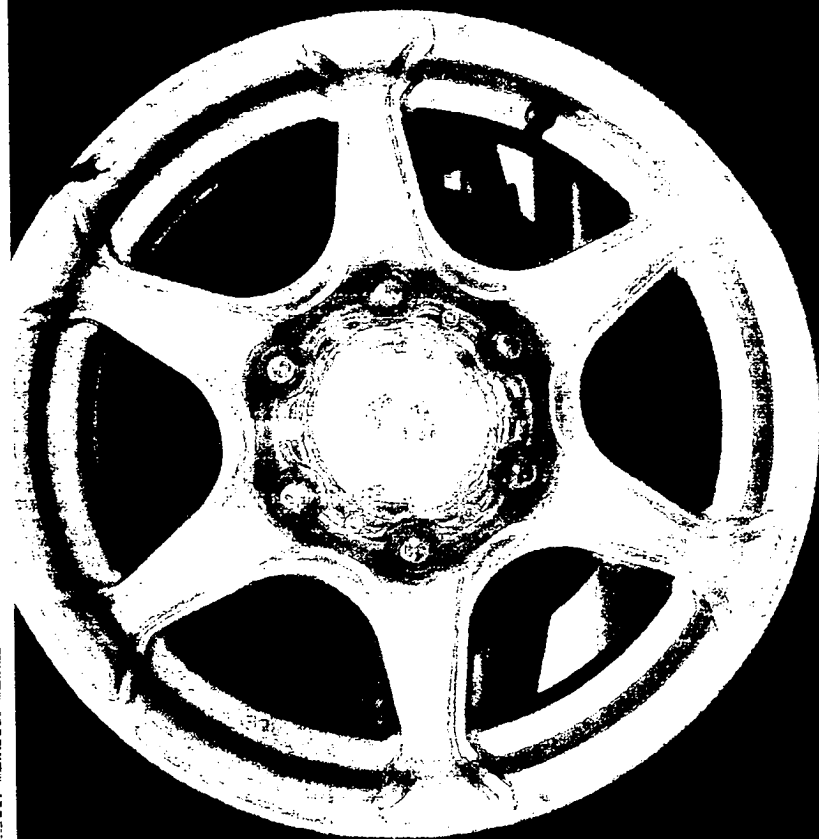
*You're in Jayco Country*

Image002.jpg  
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