



29 August, 2013

Ref no. : 222/PU-KS/2013
Subject : **Response to Statement of Essential Facts No. 198 Dumping of Hot Rolled Plate Steel Exported from The People's Republic of China, Republic of Indonesia, Japan, The Republic of Korea and Taiwan**

Director Operations 2
Anti-Dumping Commission
5 Constitution Avenue
CANBERRA ACT 2601
Australia

Dear Sir,

Based on Australian Anti Dumping Commission Statement of Essential Facts (SEF) No. 198 regarding Dumping of Hot Rolled Plate Steel Exported from The People's Republic of China, Republic of Indonesia, Japan, The Republic of Korea and Taiwan dated 1 August 2013, we would like to submit a response as advised on page 10 of the SEF. We have received and carefully read the SEF and figured out that there are a few things that might need to be clarified regarding the calculation of dumping margin, being the Normal Value of HA 250 and HA 350 in the Confidential Appendix 4 Dumping Margin.

a. HRP Product (Specification: HA 250)

Regarding this matter, we consider that the formula of the Normal Value has to be consistent with the formula that had been used before. In the column [REDACTED], it had been considered that the Normal Value was [REDACTED], however the investigator did not use the same formula for [REDACTED]. We consider it as an inconsistency that might cause a disadvantage for Krakatau Steel.

b. HRP Product (Specification: HA 350)

We noticed that there were [REDACTED] of domestic sales for HA 350 during the period of August 2011 to September 2012, therefore there were [REDACTED] price to calculate the Normal Value. We could use [REDACTED] based on the [REDACTED] as Normal Value, therefore it will affect the dumping margins.

Considering our mind of several facts above, we would like to give the detail explanation on a specific hearing regarding our clarification of dumping margin calculation based on Article 6.2 WTO Anti Dumping Agreement. On the other hand, we also would like to propose our intention to make [REDACTED] with Australian authority based on [REDACTED] WTO Anti Dumping Agreement, in order to [REDACTED].

We sincerely please that you would review our clarification that we might have some basic thought for your consideration. Looking forward to receiving the confirmation from you soon.

With best regards and thank you for your understanding and support.

Sincerely,



IRVAN K. HAKIM

President Director / CEO

PT Krakatau Steel (Persero), Tbk.



CC: Director of Trade Defense, Ministry of Trade Republic of Indonesia