

13 October 2014

Mr G Gleeson
Director, Operations 1
Anti-Dumping Commission
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commercial + international

By email

Dear Director

Alleged dumping of power transformers - “potential for use of alternative approach to dumping margin assessments”

We refer to our previous letters on behalf of ABB Limited of Thailand (“ABB Thailand”), in particular our most recent letter on this topic dated 9 October 2014.

At D2 and D3 of that letter, we advised that **[CONFIDENTIAL TEXT DELETED – serial numbers]** were transformers that were sold under contracts **[CONFIDENTIAL TEXT DELETED – commercial details relating to profitability]**, according to the Anti-Dumping Commission’s verified information. However, we also made the point that the full cost model (“FCM”) at quotation must be the relevant point at which to consider *“the estimated cost to make and sell the goods.... when pricing the goods”*.

Our client has extracted the FCMs at quotation and we now provide them to you with this letter. **[CONFIDENTIAL ATTACHMENTS – details of ABB’s costs and prices]**

We wish to explain various matters as follows:

- 1 ABB Australia requested a quotation from ABB Thailand **[CONFIDENTIAL TEXT DELETED – tender and end user information]**
- 2 The scope of the request for quotation was:

[CONFIDENTIAL TEXT DELETED – technical details of tender]
- 3 **[CONFIDENTIAL TEXT DELETED –technical details of tender and cost information]**
- 4 ABB Australia accepted ABB Thailand’s quotation, being the price that ABB Thailand had offered based on **[CONFIDENTIAL TEXT DELETED – numbers and commercial information]** contract was entered into for the supply **[CONFIDENTIAL TEXT DELETED – numbers]** transformers. We wish to correct the statements in our previous letter to the effect that there were **[CONFIDENTIAL TEXT DELETED – numbers]** contracts, **[CONFIDENTIAL TEXT DELETED – serial numbers]**.

5 We note that the enclosed FCMs **[CONFIDENTIAL TEXT DELETED – details about the way in which ABB's commercial data is presented]**.

6 **[CONFIDENTIAL TEXT DELETED – expression of degree]** FCMs at quotation show pricing that is more than the estimated cost to make and sell the power transformers concerned, **[CONFIDENTIAL TEXT DELETED – commercial details relating to profitability]**

Respectfully, we insist that you contact us should you require any further substantiation of this information, or indeed of any information that goes to the issue of estimated costs and pricing.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Moulis', with a long horizontal flourish extending to the right.

Daniel Moulis
Principal

Encs