



Milltech Martin Bright  
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30<sup>th</sup> October 2017

Mr Dale Seymour  
Commissioner  
Anti-Dumping Commission  
GPO Box 1632  
Melbourne VIC 3001

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**Investigation 384 Alloy Round Bar exported from the People's Republic of China  
Position Paper  
Statement of Essential Facts**

Dear Commissioner,

This submission is made on behalf of Milltech Pty Ltd (**Milltech**), a member of the Australian industry producing like goods to the Goods under Consideration (**GUC**) in the dumping investigation concerning alloy round bar exported by China (*investigation No. 384*).

As discussed earlier today with your Assistant Director, Mr Mayuran Jeyarajah, Milltech considers the Statement of Essential Facts (**SEF**) to be factually incorrect where it states with reference to Milltech's examples of price undercutting "that further evidence and information regarding these two examples was not provided."<sup>1</sup>

As a matter of record and fact, the documentary evidence to support the claims was provided during the verification visit in the form of:

- Copies of emails from customers;
- Documentary evidence of order cancellations; and
- Contemporaneous diary notes.

It is of concern to Milltech that this evidence has been overlooked. Quite clearly this failure to consider this highly relevant and probative evidence has lead the Commission to form the erroneous view that it "does not consider the [Milltech] claims regarding price undercutting to have been established."<sup>2</sup>

Milltech requests that the Commissioner urgently review the documentation that has previously been provided and the subsequent conclusions drawn in the SEF, and confirm that you have done the same.

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<sup>1</sup> SEF 384 pp.49 and 50.

<sup>2</sup> SEF 384 p.50

Milltech intends to provide a further detailed submission on other issues of error affecting the proposed recommendations of the SEF.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. Taylor', is positioned above the typed name.

Dean Taylor

Commercial Manager

cc. Mr Mayuran Jeyarajah

mayuran.jeyarajah@adcommission.gov.au