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14 March 2019

**The Director  
Investigations 1  
Anti-Dumping Commission  
55 Collins Street  
Melbourne  
Victoria 3000**

By email

Dear Director

## **Electra Cables (Aust) Pty Limited Comments on Statement of Essential Facts No. 469**

As you know we represent Electra Cables (Aust) Pty Limited ("Electra") and Guilin International Wire and Cables Co., Ltd. ("Guilin International") in this investigation.

We refer to the Statement of Essential Facts No. 469 ("the SEF") published for this investigation. We note the SEF's preliminary findings concerning our clients is identical to the findings stated in the Commission's verification reports for Electra and Guilin International respectively. In Electra's submission dated 8 February 2019 ("the 8 February submission") we provided extensive evidence and detailed explanations relating to certain errors in the Commission's dumping margin determination, as shown in the relevant verification reports. We understand that this submission has not been considered for the purpose of the SEF, but will be considered in the final report.

Accordingly, we hereby refer the Commission to the 8 February submission, which remains relevant and provides important material for the Commission's consideration. As noted in that submission, our clients respectfully urge the Commission to address the errors in its dumping margin determination concerning Electra and Guilin International. Our clients maintain that the goods under investigation as exported by Guilin International during the investigation period were not dumped, and that the investigation should be terminated as against Guilin International immediately.

Yours sincerely

**Charles Zhan**  
Senior Associate

**Macky Markar**  
Senior Lawyer