

[Public Record]

Ref. No.: 30/Y&C/VI/2021

Jakarta, 30 June 2021

To:

Director, Investigations 3

Anti-Dumping Commission

Department of Industry, Science, Energy and Resources

Australian Government

Re: Case No. 575 - Continuation of Anti-Dumping Measures on Clear Float Glass exported from the People's Republic of China, the Republic of Indonesia and the Kingdom of Thailand ("AD Investigation")

Dear Sirs,

We, Law office Yang & Co., in this matter representing PT Asahimas Flat Glass, Tbk ("**AMG**") and AGC Asia Pacific Pte Ltd ("**AAP**"), convey our response to ADC Dumping Margin Calculation of AMG and AAP as email from [REDACTED] dated 21 June 2021. Please find below our response to Anti-Dumping Commission ("**ADC**")'s dumping margin calculation for AMG.

In the last investigation (5 years ago) the ADC used a yearly method of calculation for the dumping margin but in this investigation the ADC has moved to a quarterly method of calculation.

If ADC uses yearly method of dumping margin calculation as it should, we note that the AMG's dumping margin is [OFFICIAL:Sensitive] and the calculation table is as follows:

[OFFICIAL:Sensitive]

Even, if we use the quarterly method calculation, the dumping margin is not exceeded [OFFICIAL:Sensitive] as per our calculation below:

[OFFICIAL:Sensitive]

We also note the ADC found the normal value on an FOB basis whereas the ADC should be using net ex-mill. The CTMS we calculated using COP (Cost of Production) added with SGAF as a percentage to revenue and for the profitability test, we compare net invoice with CTMS.

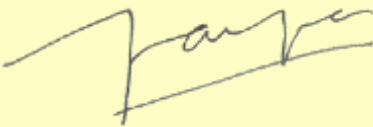
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Therefore, we request ADC to calculate the margin dumping using yearly method based on the above.

Thank you for your kind attention.

Kind Regards,
Law Office Yang & Co



Christian Jaya, SH, LL.M

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