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BASF Construction Chemicals Australia Pty Ltd

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22 February 2010

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Subject: Statement of Essential Facts No. 150 dated 31 January 2010

(sent by email to tmops1@customs.gov.au)

NON CONFIDENTIAL VERSION

Dear Sir/Madam,

Reference is made to Statement of Essential Facts No. 150 (SEF 150) dated January 31, 2010 issued by Australian Customs Service (Customs). This is a response on behalf of BASF Construction Chemicals Australia Pty Ltd (BASF) to the SEF 150. In this response, BASF will adopt the same terminology as that adopted by Customs in the SEF 150, including the abbreviations.

1. BASF submits that where Customs makes a determination that dumping has occurred within the meaning of the legislation, then it is essential for Customs to further establish each of the following:

i. whether the Australian industry's performance has deteriorated,

ii. whether any injury suffered would be considered material, and

iii. whether the dumping by BASF has caused the material injury to the industry.

2. Any injury that has resulted from other sources should not be attributed to the dumping. Consequently, before any action may be taken against dumped goods, the Australian industry concerned must demonstrate not only that dumping is occurring, but that the Australian industry has suffered material injury as a result.

3. Having regard to the vital interests of Customs to protect Australian industry, BASF refers to the WTO principle of "*meaningful non confidential summary*." Whilst we fully support the need for confidentiality, BASF considers further disclosure is necessary to prepare an appropriate statement, in particular the disclosure of more indices e.g. in the form of indexed tables showing the impact claimed by the applicant and by Customs.

4. Based only on the information included in the SEF 150, BASF does not accept the finding of Customs that the SECA imports in 2008 by BASF caused a material injury. BASF further rejects that there is a causal link between the alleged injury and the BASF imports.

5. Material injury to an Australian industry is essentially a not insignificant deterioration in the economic performance of that Australian industry in terms of its activities in the Australian market. As part of its assessment of material injury, Customs examined whether the Australian industry had suffered injury by a consideration of the following factors, which Customs subsequently affirmed

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i. loss of sales volume (sections 7.4.1 and 8.5.1),

i. loss of market share (sections 7.4.2 and 8.5.2),

ii. price undercutting (section 8.4.1),

iii. price depression (sections 7.5.2 and 8.4.2) , and

iv. reduced profit and profitability (sections 7.6 and 8.5.1) .

6. The injury period examined by Customs to assess the applicant's claim of material injury from allegedly dumped SECA from USA was from 1 July 2008 to 30 June 2009 referring also to the time period from June 2009 (sections 8.5.1).

7. The 'reduction of sales revenue and of return of investment" mentioned in the subsection "preliminary conclusion – economic condition of the industry" (section 7.8) has not been considered as a material injury in the subsection Material injury (section 8). Therefore, BASF makes no comment on this point.

8. BASF's responses to Customs' assessment of material injury:

i. Loss of sales volume (sections 7.4.1 and 8.5.1)

The Customs investigation revealed that Applicant lost sales volumes in both 2007-08 and 2008-09 to the levels below 2005-06, which (due to Applicant being the sole manufacturer of SECA in Australia) should have been directly due to the dumped imports only.

According to section 7.3 of SEF 150 Applicant did not attribute any injury caused by BASF's imports until September 2008. In that time, BASF imported the following volumes [redacted] which did not cause any injury to Applicant:

[redacted]

Based on the foregoing, [redacted] remain the subject of the Customs investigations. BASF submits that even if such a quantity caused any injury there is no indication that such an injury was material

In addition, BASF draws the attention of Customs to the fact that it did not consider adequately or at all the statement of [redacted] (being one of the relevant customers) that it changed suppliers from the Applicant to BASF in its [redacted] operations due to the lower dosage rates and, therefore, lower pricing of the BASF product.

Customs concluded its assessment of this point with the sentence:

> "Customs is satisfied that there is no inherent difference in dosage rates between the locally produced and imported products that would provide a price advantage to the imported product".

BASF contends that the Customs assessment was flawed and relies on the data set out below:

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(a) there is an unambiguous end-user recommendation covered by BASF warranty – refer paragraph on "Quantity to Use" **Attachment 1 – BASF Data Sheet for Rheopel Plus.** This is missing from the Applicant's data sheet – **Attachment 2 – "Block emulsion".**

(b) the BASF product required use of a significant lower quantity in order to achieve the effect required – refer "Use Instructions - Dosage" in **Attachment 2.**

Additional BASF comments on Attachments 1 and 2:

Comparing Attachment 1 and 2 it should be noted that the applications of the SECA refer to two different scale types. The recommendation for Block Emulsion refers to dosage rate of 1 liter per tonne of **dry mix** ingredients. Dry mix ingredients are cement, fly ash, silica fume, sand, aggregate or similar. That means 1 litre per tonne does not refer only to cement but also to other ingredients.

The fundamental difference is there is a greator volume of dry materials in a cubic metre of concrete than there is cementitious material. According to Attachment 2, Tech Dry's data sheet suggests 18% cementitious, 82% sand and aggregates. It also refers to wet material (one must add water to cement to get a reaction) and states that 1.7 litres of "Block Emulsion" is required to 1700kg of wet mix ingredients.

Using the 18% Tech Dry quote, and 1000 kgs of dry mix, a user will have 180 kgs of cementitious material, which will require 1.8 x 0.325l of Rheopel Plus (or 0.59 litres of Rheopel Plus) as compared to 1 litre of Tech dry. For **wet mix**, a user will still need 0.59 litres of Rheopel Plus to 1.7 litres of Tech Dry. This is why it is always more relevant to compare the treated cost per cubic metre of concrete.

"Block Emulsion" dosage	"Rheopel Plus" dosage
For approximately 1700 kg of **wet mix** ingredients 1.7 litre "Block Emulsion" is required.	For approximately 1700 kg of **wet mix** ingredients, only 0.585 litre of BASF's "Rheopel Plus" is required.
Considering the "performance tests" (page 2 of Product information "Block emulsion) the concrete substrate contains 18% cement and 82% graded sand etc., which are mixed with 1 litre of "Block emulsion"	Using the 18% Tech Dry quote and 1000 kgs of **dry mix**, the quantity of 180 kg of cementitious material requires only 0.585 litre of "Rheopel Plus".

Finally, BASF commenced supply to [redacted] is the only customer that BASF gained directly from Applicant. The volumes BASF supplied to [redacted] should have resulted in a decrease in sales of Applicant representing not more than 8% to 9% of Applicant's total sales.

BASF contends that such a reduction of sales cannot be seen as material.

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ii. Loss of market share (sections 7.4.2 and 8.5.2)

Customs made a finding that the Australian market for SECA grew in 2008 and 2009 (over injury period from July 2008 to June 2009) whereas Applicant's market share decreased by more than 20% in September 2009.

According to BASF research, the market growth within the injury period cannot be ascertained given the fact the three main users of SECA (Adbri Masonry, Boral and Austral) suffered a considerable decline in business due to market factors

BASF relies on **Attachments 3 and 4 (BIS Shrapnel Index September 2009 and ABS MCP statistics extract)** which provide some indices for the construction market These statistics confirm BASF's view of the reduced demand for concrete and, in consequence, for SECA.

The explanation BASF offers to Customs finding growth in the SECA market for that period is due to the inclusion of SECA quantities sold to and consumed by [redacted] operations.

BASF is of the view that this is an erroneous finding. It is within BASF's knowledge that [redacted] utilized a fatty acid-based product of another supplier in the immediate period before it commenced use of the BASF SECA product. [redacted] was not a customer of Applicant in this immediate period.

BASF submits that the fatty acid-based products and SECA were *like-products* and the replacement of the fatty acid-based product with SECA or the other way around would not lead to any market growth. In reality, replacement of one product with the other neutralizes any growth in demand because where SECA is substituted for a fatty acid-based product, the substitution would cause a market growth for SECA and a huge market decline for the fatty acid-based product.

Attributing a substitution of products to actual market growth is artificial and simplistic. For the reasons set out in subsection 3.4 of SEF 150, BASF recommends treating SECA and fatty acid-based product as *like-products*.

Therefore, there was no actual market growth in the period affected by the global financial crisis and the alleged loss of market share claimed by Applicant was actually business won by BASF by converting a customer from utilizing a fatty acid-based product to a SECA product.

For the record, Applicant lost this very customer to a fatty acid-based supplier well before BASF entered the market.

iii. Price undercutting (section 8.4.1)

The alleged price undercutting results from the methodology Customs chose to compare BASF and Applicant's price per unit. Due to the different concentrations of SECA in the BASF and Applicant's products, Customs converted the selling prices to a common concentration of the active ingredient. However, the calculation based on active ingredient is not an accurate way of determining this data. There are other factors such as cement quality, which impacts on the treated cost per cubic meter of product manufactured (cement or concrete) The experience of BASF's global R&D teams suggests that "equivalency" is best assessed by choosing the middle of the recommended dosage range for each product. Active ingredient assumes they are either the same, or have the same effectiveness, which may not necessarily be the case

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Using the preferred methodology, BASF submits that the price per unit should have been calculated with reference to the dosage required per cubic meter of the final product. The pure reference to the active ingredient distorts the result and does not correspond to the reality. With the same quantity of BASF's SECA the customer can grade up the higher quantity of cement or concrete than with Applicant's SECA.

Therefore, BASF submits that even if Applicant's product is a *like-product* in terms of Section 269T of Customs Act 1901 it is not identical in *all* respects with product under consideration and, thus, the method to calculate the price per unit is wrong and has to be reconsidered

BASF provides a sample of such a calculation [redacted]

iv. Price depression (sections 7.5.2 and 8.4.2)

The price depression claimed by the Applicant occurred earliest as of August 2009 and affected not only the applicant but all of the SECA and fatty acid-based concrete admixtures producers. BASF is aware that BASF as well as other suppliers were approached by the users of these products with a request for reduction of the price for the raw materials. As a sample we provide a copy of the letter sent to BASF by [redacted]

As a result of this request, suppliers were forced to grant price reductions to retain the customer's business due to the impact of the GFC to the construction industry in Australia

The conclusion is that the market for cement and concrete dropped and led to the decline of the market for SECA and other admixtures, and therefore the price suppression. Customs instead attributed the price suppression to the competition between the suppliers.

Additionally, BASF draws Customs' attention to the fact that during 2008 Adbri, as a major producer of cement in Australia, purchased a number of MCP manufacturers including Hanson and C& W Blocks. These businesses have merged as Adbri and the new organization uses its combined purchasing power to seek lower prices for major raw materials and any admixtures (whether SECA or fatty acid based).

v. Reduced profits and profitability (sections7.6 and 8.6.1)

The profit effects described by Customs with reference to sections 8.5.1 and 8.4.2 cannot be attributed to the imports of SECA by BASF. The loss of sales volumes as well as the price depression is mainly the result of other developments. Provided that Customs findings were accurate, the injury should have occurred not after June 2009 but in 2006 or 2007 being the period the first imports came to the market.

Additionally, looking at the graph on page 23 of SEF 150 and considering the fact stated by Applicant (section 7.3.) that there was no injury until September 2008, the conclusion that BASF's imports affected the profit and profitability is incorrect. In the time between June 2007 and July 2008 Applicant suffered a considerable drop of profit and profitability, which continued in the following time period (from July 2008 to August 2009) albeit at a lesser scale. So it seems more likely that the reasons for the reduction of profits and profitability were self-inflicted and had nothing to do with BASF's activities.

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9. **Other possible causes of injury - global financial crisis (section 8.7.1)**

Customs findings regarding the impact of global financial crisis (GFC) on the Australian industry and on the SECA market are unconvincing. Customs states that the GFC broadly affected the economy in Australia and provided a graph issued by the Australian Bureau of Statistics (page 30 of SEF 150). The graph shows the volume of concrete brick, block and pavers decreased from June 2008 to September 2009 and recovered after this period. In the second step Customs denies the (negative) impact of GFC on the SECA market ("despite any effects of GFC") and concludes that the market for SECA grew because BASF was able to gain new customers changing from fatty acid-based admixtures to SECA. The subsection ends with the opinion that GFC had not been the cause of Applicant's injury.

Such an approach is not comprehensible.

Firstly, to conclude that the GFC was not the cause of Applicant's injury is wrong because all of Customs' arguments are related to SECA's volumes and not to price undercutting or depression and profitability. So the arguments are not sustainable for the conclusion.

Secondly, the strong interpretation of the graph on page 30 of SEF 150 would have been that in the time from June 2008 to September 2009 the market for SECA dropped considerably, which would impact the volumes of SECA placed on market, it's prices and the profitability of the business. Expressed with figures the graph illustrates a decline of concrete bricks volumes from about 720 in June 2008 to about 580 in September 2009. It means the volume dropped by approximately 20%.

This supports BASF's view that the loss of market share claimed by the Applicant and estimated by Customs in subsection 7.4.2 (20%) was due to the general development of the market in Australia. [redacted]

10. **Causal link between material injury and BASF's imports (section 8.8)**

The explanation of the causal link misjudges the facts described in the SEF 150. BASF contends that the inability of the Australian industry to match prices of the imported products was not due to any price undercutting (see para above 8.3) but from Applicant's cost intensive marketing structure (changed after June 2009), inflated prices and inefficient production. Furthermore, as the GFC had direct impact on producers of cement and concrete there was a need to reduce the costs of raw material. The customers approached all of their suppliers and not only the Applicant for a price reduction. It is therefore naive for Customs to state that the reduction in price was due to SECA imports from USA because then a price reduction request would not have been made to BASF as well. Thus, the assumption the price decline came from SECA imported from USA is completely unfounded.

11. **Non-injurious price (section 10)**

In calculating the non-injurious price (NIP) of a product, the first step is to establish an unsuppressed selling price (USP).

The USP is the price at which the local industry might reasonably sell its product in a market unaffected by dumping.

In our understanding the USP is the price achieved by all suppliers of SECA before dumping was (unequivocally) identified and not only assumed. So regard must be given to not only the price that the Applicant calculated [redacted] as well as the prices of all imports prior to the period of investigation. Due to the monopolistic price structure of the Applicant before BASF's entry into the market, BASF submits that [redacted] as

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well as of the imports before injury have to be considered to calculate the USP. [redacted]

BASF is of the view that the (unweighted) average of these prices will reflect the actual market price.

After calculation of the USP the costs incurred in freighting the goods from the export FOB point to the relevant level of trade in Australia are deducted. The costs cover, *inter alia*, overseas freight and insurance. Moreover, the customs duties to be paid upon importation in Australia have to be deducted, as well. The standard duty rate amounts to 5% and the preferential duty rate of 0% is only applicable if the goods in question fulfil the criteria laid down in the Free Trade Agreement between USA and Australia. This criterion requires the exporter to provide the importer with the Certificate of Origin, the importer to claim the preferential duty rate by lodging the customs declaration and the certificate of Origin and Australian Customs accepting the documentation. In summary, there are a lot of conditions to be met before the goods can enjoy the duty reduction up to 0%. If the deduction of duties has not been done for the purpose of NIP's establishing the importer would then pay the customs duties twice: via NIP as the standard duty rate is not deducted and then upon importation if the certificate of origin is not provided to Customs.

We trust that the above points are self explanatory, however should any additional information be required, please do not hesitate to contact the undersigned. We consider the above document and attachments to be confidential, a non confidential version for inclusion in the public record will follow.

Please contact Mr Leo vanden Heuvel on +61 2 8811 4200 for any inquiries on this response.

Yours Sincerely,
BASF Construction Chemicals Australia Pty Ltd.

Leo vanden Heuvel
Regional Director

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Attachment 1
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RHEOPEL® PLUS

Water repellent and efflorescence control admixture

DESCRIPTION

Rheopel Plus multi-purpose admixture can be used in a variety of water-repellent and efflorescence control applications. This unique formula is based on a novel chemistry that is different from that of every conventional water-repellent admixture in the concrete industry.

With its flexible dosage range, **Rheopel Plus** admixture enables increased production rates of visually appealing manufactured concrete products and precast concrete products that have superior water repellency and secondary efflorescence control properties, increased strength performance, and improved color vibrancy. **Rheopel Plus** admixture also exhibits excellent wind-driven rain resistance and has achieved the highest rating per ASTM E 514.

RECOMMENDED FOR

- Architectural block
- Single-wythe masonry construction
- Paving stones
- Segmental retaining wall units
- Concrete roof tile
- Precast /prestressed concrete

FEATURES AND BENEFITS

- ***Unique formulation***
- ***Part of block producer water-repellency certification program***
- ***Contains components that enhance color and reduce efflorescence potential***
- ***Provides improved material flow and extrusion characteristics***
- ***Superior water repellency versus conventional water-repellent admixtures***
- ***Significantly reduces secondary efflorescence (improves primary efflorescence control)***
- ***Improves color vibrancy and pigment efficiency***
- ***Increases compressive and flexural strengths***
- ***Increases production rate***
- ***Adds visual appeal***

QUANTITY TO USE

Use **Rheopel Plus** admixture at a dosage in the range of 130- 325 mL/100 kg of cementitious material depending on the desired benefits.

- Efflorescense Control: Typically 195-325 mL/100 kg of cementitious material.
- Water Repellency: Typically 130-325 mL/100 kg of cementitious material Optimum water-repellency dosage rates are determined through mix evaluation and testing procedures.

Please consult with your local BASF Construction Chemicals technical representative if dosages outside of the listed ranges are being considered.

To further improve the color efficiency and strength performance, the addition of a **Rheomix** high-performance plasticizing admixture is recommended.

MIXING

For maximum efficiency, add **Rheopel Plus** admixture after wetting of aggregates and cement, and after at least 75% of the final mix water has been added. Allow at least 90 seconds of additional mix time after **Rheopel Plus** admixture has been dispensed.

PRODUCT NOTES

Rheopel Plus admixture will not compensate for flaws in building design, materials, mix proportions, improper production procedures or improper construction methods. BASF Construction Chemicals is not responsible for inappropriate use of **Rheopel Plus** admixture.

Proper block manufacturing methods, proper masonry mortar proportioning and mixing and proper use of **Rheopel Plus** admixture must be followed. Raked joints should not be permitted for water-repellent admixture system masonry projects. Remove excess mortar promptly and clean any residue.

Note: Rheopel Plus Mortar Admixture must be used in the masonry mortar at a minimum dose rate of 65ml/100kg in order to produce a moisture penetration resistant wall system. Failure to do so will result in compromised water repellency of the masonry structure. Consult your local BASF Construction Chemicals technical representative for applicable design details and specifications.

STORAGE

Rheopel Plus admixture must be protected from hot and freezing temperatures. **Rheopel Plus** admixture must be stored at a material temperature between 4 °C and 40 °C. **Rheopel Plus** admixture is not useable after it freezes.

SHELF LIFE

Rheopel Plus admixture has a minimum shelf life of 6 months. Depending on storage conditions, the shelf life may be greater than stated. Please contact your local BASF Construction Chemicals representative regarding suitability for use and dosage recommendations if the shelf life of **Rheopel Plus** admixture has been exceeded.

PACKAGING

Rheopel Plus admixture is available in 20 litre cubes, 205 litre drums and 1040 litre pallecons.

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RHEOPEL® PLUS

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Tech-Dry®

ATTACHMENT 2
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PRODUCT INFORMATION

BLOCK EMULSION

Manufacturer's code: RPBE **Updated:** 01/01/2008

Product Name: BLOCK EMULSION

Description: BLOCK EMULSION is an innovative admixture for pressed concrete. When BLOCK EMULSION is incorporated into pressed concrete products, the permeability to water and the occurrence of unsightly efflorescence is virtually eliminated. The use of BLOCK EMULSION enhances the intrinsic quality of pressed concrete products by reducing the damage caused by weathering-related water uptake and efflorescence.

Recommended Uses: BLOCK EMULSION is designed to be a water-repellent admixture during the manufacture of pressed concrete products including load-bearing blocks, decorative blocks, coloured blocks and blocks for retaining walls and basements. It may also be added into concrete pavers or other pressed concrete masonry or similar procedures. However, it is not recommended to be used in aerated concrete masonry or wet-mix concrete product. Some of the features of BLOCK EMULSION pressed concrete include:

- Reduces water absorption and efflorescence by over 80%.
- Product remains permanently bonded to the substrate and cannot be washed out.
- Does not leave an oily residue on the masonry substrate.
- Easy to use in any existing processes.
- The degree of water resistance can be varied by changing the rate of addition.
- Water-based technology with no hazardous material emitted during use.

As masonry materials vary, it is always recommended that a test must be carried out prior to application to find out the suitability of this product for the purpose.

Use Instructions:

1. Dosage

The rate of addition depends on the specific mix design and the level of water repellency required. The usual dosage rate is about 1.0 litre of BLOCK EMULSION per tonne (1000kg) of dry mix ingredients.

2. Addition

BLOCK EMULSION is designed to be added as part of the gauging water during the mixing process.

If a typical mix has 1000kg of dry ingredients, the procedure to incorporate 1.0 litre of BLOCK EMULSION into this 1000kg of dry mix would be as follows:

1) Thoroughly mix all the concrete dry ingredients (1000kg) in a batch mixer.
2) Stir or mix BLOCK EMULSION before use.
3) Measure out 1.0 litre of BLOCK EMULSION and dilute it with 5 litres of clean water.
4) Spray this diluted emulsion into the dry mix while blending.
5) Blend the mix thoroughly while adding clean water to attain the desired consistency. The mix can now be processed as usual.

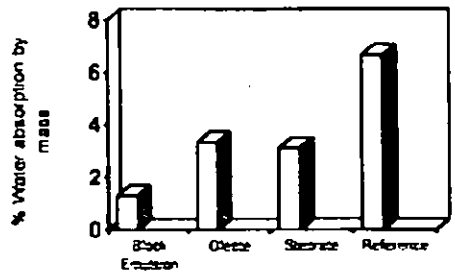
If your process is substantially different to that described above, please do not hesitate to contact the manufacturer or the sales agent for assistance.

Performance tests

1. Reduction in Water Absorption

The pressed concrete substrate used for testing contains 18% cement and 82% graded sand and aggregates with BLOCK EMULSION at a dosage rate of 1.0 lt/tonne. Commercial oleat and stearate water repellent admixtures were used as comparisons. The test substrates were initially covered with plastic for 24 hours in ambient conditions for obtaining initial strength followed by 28 days curing at ambient conditions before testing. Sponge capillary water absorption was conducted. The test results are shown in Figure 1. The performance of BLOCK EMULSION is far superior to that of the reference and is much better than those of the substrates with oleate and stearate.

Figure 1. Reduction in Water Absorption



2. Controlling Efflorescence

The efflorescence test is conducted by laying the above test substrates on a wet sponge placed in a solution containing 10% sodium sulfate. The top surface of the substrate was visually monitored for occurrence of efflorescence for 7 days. Table 1 indicates that efflorescence of the substrate treated with BLOCK EMULSION was found to be virtually eliminated during the test period.

Table 1. Efflorescence Occurrence

Substrates	After 1 day	After 3 days	After 7 days
With BLOCK EMULSION	No efflorescence	No efflorescence	Very limited efflorescence
Reference	100% saturated with the salt solution	-	-

Typical Data:

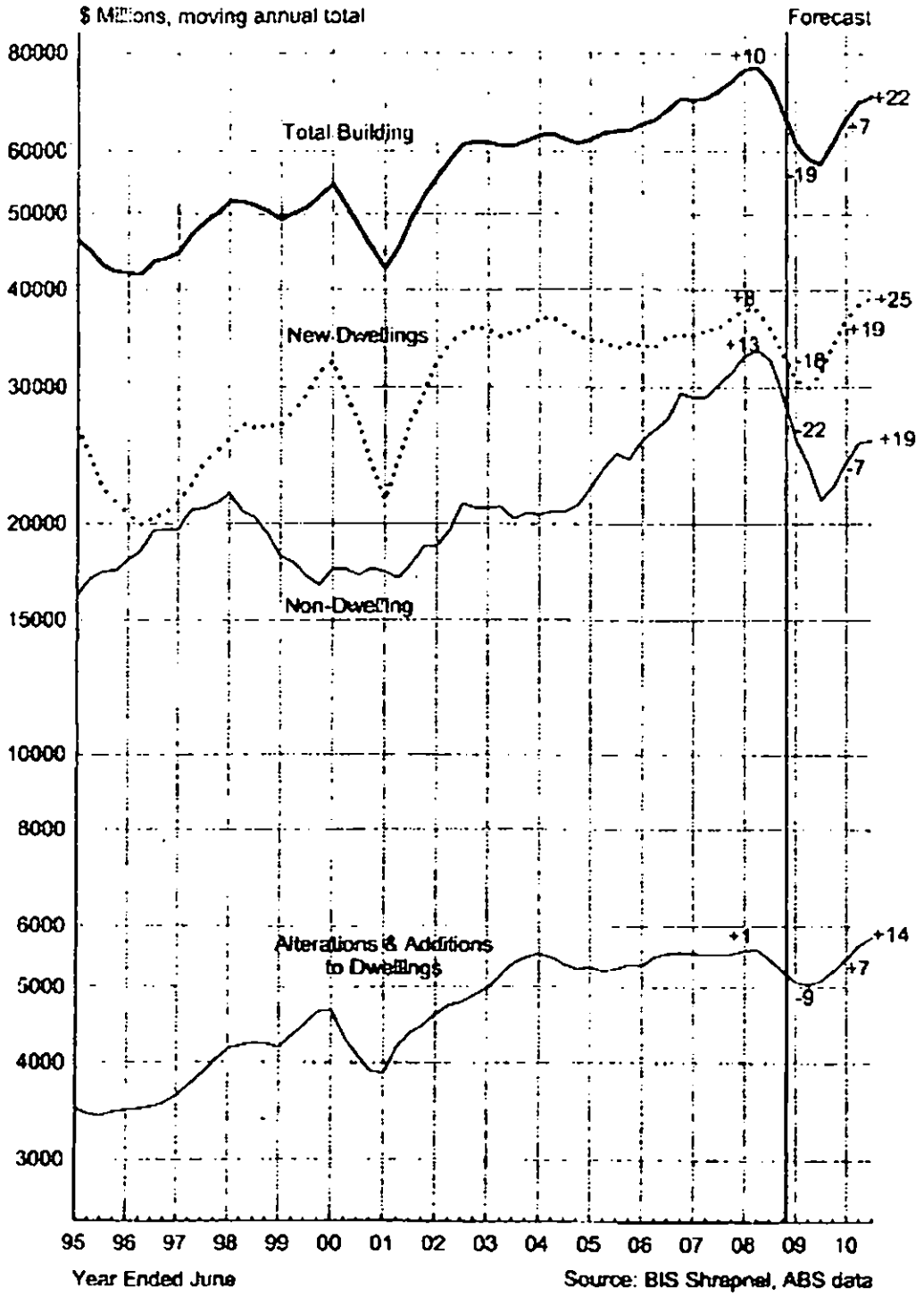
Appearance:	Milky white liquid with slight odour
Solids content:	<50% by weight
Specific Gravity:	0.975 gm/ml
pH value:	7-8
Solubility in water:	Miscible
VOC content:	Nil
Flash point:	>61°C

Important Note: As conditions vary, it is recommended that a pilot trial should be carried out prior to using BLOCK EMULSION to determine the suitability of this product for the purpose.

Handling & Storage: BLOCK EMULSION is a non-hazardous material. However, good industrial hygiene procedures should be followed when handling it. The product should be stored in closed containers in a cool dry place away from any fire sources. The product has a shelf life of 12 months in a sealed container stored at a temperature below 25°C.

Packaging: BLOCK EMULSION is available in 20 and 200 litre plastic drums or 1,000 litre plastic bulky bins. Other size containers may be available on request.

Australia – Building Commenced
Chain Volume Measures – Reference Year 2006/07



Attachment 4
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Qtr	Total Prodn	
UOM	ton	
Sep-91	442,784	
Dec-91	462,114	
Mar-92	404,800	
Jun-92	439,786	
Sep-92	480,078	
Dec-92	465,214	
Mar-93	423,651	
Jun-93	492,000	
Sep-93	551,000	
Dec-93	536,000	
Mar-94	526,329	
Jun-94	608,704	
Sep-94	650,650	
Dec-94	657,302	
Mar-95	583,237	
Jun-95	605,000	
Sep-95	615,000	
Dec-95	592,000	
Mar-96	528,000	
Jun-96	540,000	
Sep-96	558,000	
Dec-96	553,000	
Mar-97	531,000	
Jun-97	606,000	
Sep-97	605,000	
Dec-97	585,000	
Mar-98	567,850	
Jun-98	598,002	
Sep-98	650,159	
Dec-98	632,502	
Mar-99	595,947	
Jun-99	634,671	
Sep-99	700,132	
Dec-99	690,120	
Mar-00	667,476	
Jun-00	747,462	
Sep-00	692,797	
Dec-00	584,361	
Mar-01	549,192	
Jun-01	581,000	2,407,350
Sep-01	651,000	
Dec-01	652,000	
Mar-02	633,000	
Jun-02	694,000	2,630,000
Sep-02	747,000	
Dec-02	714,000	

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Attachment 4

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Mar-03	694,000	
Jun-03	705,000	2,860,000
Sep-03	799,000	
Dec-03	781,000	
Mar-04	785,000	
Jun-04	789,000	3,154,000
Sep-04	816,000	
Dec-04	791,000	
Mar-05	697,000	
Jun-05	722,000	3,026,000
Sep-05	752,000	
Dec-05	723,000	
Mar-06	687,000	
Jun-06	711,000	2,853,000
Sep-06	746,000	
Dec-06	727,000	
Mar-07	686,000	
Jun-07	729,000	2,888,000
Sep-07	731,000	
Dec-07	647,000	
Mar-08	641,000	
Jun-08	719,000	2,738,000
Sep-08	681,000	
Dec-08	591,000	
Mar-09	566,000	
Jun-09	561,000	2,399,000
Sep-09	652,000	