PUBLIC RECORD — NON-CONFIDENTIAL VERSION

Guangdong TTR Automation Co. Limited

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4 November 2026

The Commissioner
Australian Trade Remedies Commission
By email: Investigations1@atrc.gov.au

Re: Investigation No. 691 — Aluminium windows and doors from the People's Republic of China — Submission of Guangdong TTR Automation Co. Limited (producer; residual exporter) on the Statement of Essential Facts dated 14 October 2026

Dear Commissioner,

1. The company

Guangdong TTR Automation Co. Limited (TTR) manufactures the goods at GuTang Road, DaWang High-Tech District, Zhaoqing City 526238, Guangdong Province, China. TTR's ownership and its relationship with its Australian importer are set out in the confidential version of this submission. TTR is listed by name as a residual exporter in SEF Table 6.

All of TTR's exports of the goods in the investigation period were sold to Skynet Metal Trading Co., Limited (Skynet), a Hong Kong trading company, which exported them to Australia as the named supplier and shipper. No goods were exported through any other party.

In answer to question 2 of the preliminary information request, TTR listed "TAWS" and "TTRA" as names under which the goods are supplied. These are the brand names under which TTR-made goods are marketed in Australia; they are not companies in which Skynet holds an interest.

TTR lodged its preliminary information response on 6 December 2025, provided supplementary information and model control code data on 14 January 2026, and corresponded with the Commission on 11, 14 and 23 January 2026. In response to the Commission's request of 23 January 2026 this submission is lodged in confidential and non-confidential versions. Skynet lodges a separate submission; the two are consistent and each company speaks for its own operations.

2. Sales in the investigation period

In the investigation period (1 July 2024 to 30 June 2025) TTR sold approximately 35,000 m² of the goods to Skynet, as reported in its preliminary information response; Skynet exported the same quantity to Australia. The sales values are given in the confidential version. TTR quotes Skynet per project and invoices by progress, so that a project is typically covered by several invoices.

A transaction-level schedule of these sales will be compiled and provided to the Commission on request. TTR's prices to Skynet are set project by project from the project's glass, extrusion, finish, thermal, acoustic and structural requirements.

3. The goods and the cost of production

The goods are predominantly fully assembled insulated-glass window wall and door units engineered for multi-storey Class 2 buildings in Australia, including AS 4284-tested systems with laminated acoustic glazing. TTR's AS 4284 test report (AB23, Rev.00) and its ISO 9001, ISO 14001 and ISO 45001 certificates were provided to the Commission on 14 January 2026. TTR operates an automated plant with a workforce of 45; its production is project-engineered, not catalogue product.

Glass, hardware and fabrication labour form the greater part of TTR's cost of production; aluminium extrusions form a smaller share than in standard residential windows. TTR asks that any comparison be made at model control code level (SEF Table 9) and that the margin applied to these goods reflect those models rather than a weighted average across exporters with different product mixes.

4. Participation in the investigation

The Commission's correspondence of 12 January 2026 confirmed that TTR is a residual exporter, not an uncooperative exporter, and invited TTR to lodge an exporter questionnaire by 16 February 2026. TTR did not complete the exporter questionnaire within that period: the invitation was not acted upon in time and TTR became aware of the omission after the date had passed. TTR records this plainly and does not ask the Commission to disregard it.

TTR now offers to complete the full exporter questionnaire, including the cost-to-make-and-sell data, and to submit to verification at its premises, on request. TTR has read the Commission's decisions in SEF section 2.4.3 on the requests for individual examination made for Hennissy and Pearl Facade and does not ask the Commission to repeat an exercise it has found impracticable before the final report.

5. Requests

TTR asks the Commissioner:

- to confirm that Guangdong TTR Automation Co. Limited and Skynet Metal Trading Co., Limited remain residual exporters, listed by those names, in the final report and in the dumping duty notice;
- to note on the record the offer of exporter-questionnaire-level data, so that any application for duty assessment by an importer of these goods under Division 4 of Part XVB of the Customs Act 1901, or any review of the measures, can proceed on verified data for these goods; and
- in relation to the residual dumping margin under section 269TACAB(2)(c) and (d), to state in the final report which selected exporters' export prices and normal values are included in the weighted averages, the basis of weighting, whether the verified data of Altop Facade Co., Ltd are included and, if not, the basis for their exclusion, and to confirm that data the Commission found unreliable (SEF section 6.10) are not included.
- to treat TTR's correspondence of 11 and 14 January 2026, including the certificates and test report attached to it, as part of the record of this investigation.

6. Confidentiality

This is the non-confidential version for the public record. The confidential version lodged with the Commission contains TTR's ownership, sales volumes and values and customer details, which are summarised in general terms here.

Yours faithfully,

Joan Kuang
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