

19 May 2016

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Your reference:
Dumping and Subsidisation Investigation ADC 341

Our reference:
2838755

Dear Sir

**Investigation into alleged dumping and subsidisation of A4 copy paper exported from the Federal Republic of Brazil, the Peoples Republic of China, the Republic of Indonesia and the Kingdom of Thailand – Australian Dumping Notice No 2016/33
Double A (1991 Public Company Limited)**

Preliminary Submissions – Non-confidential – For Public Record

We act for Double A (1991) Public Co Ltd (**Double A**) in relation to the above investigation. Set out below are Double A's preliminary submissions.

- 1.1 Double A manufactures A4 paper goods in Thailand, and is both an importer and exporter of those A4 paper goods.
- 1.2 During the period of the investigation, the majority of Double A's exports were marketed and sold under the Double A brand.
- 1.3 Double A submits that the products sold under its Double A brand should be differentiated from other products on the market in Australia because those products are:
 - (1) [redacted] [pricing information]
 - (2) [redacted] [product information]
 - (3) [redacted] [marketing costs information]
- 1.4 Accordingly, Double A brand products are not "like" products when compared with private label or commodity goods.

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 NORTON ROSE FULBRIGHT

In our letter to the Commission dated 17 May 2016 and our subsequent teleconference on 18 May 2016, we indicated to the Commission that Double A has identified at least 41,000 data entries that fall within the scope of the investigation, and due to the volume of data and difficult extraction and analysis processes, our client would be unable to complete a verifiable response to the exporter questionnaire by the deadline of 19 May 2016. For the same reasons, our client is unable to make full and final submissions, particularly on the key issue of normal value at this stage. Our client anticipates that it will be necessary to make those submissions once all data has been extracted and analysed.

Double A remains committed to cooperating with the Commission's investigation and provides these preliminary submissions to assist the Commission in understanding our client's position.

Yours faithfully



Hazel Brasington
Partner
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