

11 August 2015

Director Operation4  
Anti-Dumping Commission  
PO Box 1632  
MELBOURNE VIC 3001  
AUSTRALIA

Dear Director,

Statement of Essential Facts ("SEF 263")

This submission is made on behalf of Jiangsu Yaozhong Aluminum Wheels Co.,Ltd ("Jiangsu Yaozhong") and in response to the Anti-Dumping Commission's (the Commission) preliminary findings outlined in Statement of Essential Facts Report No. 263 ("SEF 263").

The purpose of this submission is to respectfully request the Commission to determine the floor price by wheel diameters.

SEF 263 stated that the Commission has determined that an ascertained export price be set at the normal value calculated for Jiangsu Yaozhong for the purposes of this review. Hence there is no requirement to calculate a dumping margin for Jiangsu Yaozhong.

In accordance with subs. 5(5) of the Customs Tariff (Anti-Dumping) Regulation 2013, the Commission has determined that Jiangsu Yaozhong's normal value will constitute a floor price for the goods exported to Australia.

In the calculation of SEF263, the Commission calculated a weighted average normal value of all products to constitute a floor price for the goods exported to Australia.

Jiangsu Yaozhong considers that the aluminum wheels products are diversified and multi-sized. It is obvious that different diameter wheels have major cost variances and sales price variances, a single floor price apply to all rim size products is inappropriate. In view of this, Jiangsu Yaozhong considers that the Commission should determine a detailed floor price by wheel diameters, in accordance with the Commission's calculation Jiangsu Yaozhong submits a detailed floor price as reference in below table.

Public Version

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Wheel Diameter (inch)	WA NV Constructed	Floor price in AUD	Floor price in USD
14			
15			
16			
17			
18			
19			
20			
21			
22			
<b>Total</b>			

Average exchange rate 0.1773 RMB to AUD during investigation period

Average exchange rate 0.1627 RMB to USD during investigation period

Yours sincerely

Paul Chao