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Director Operations 3
Anti-Dumping Commission
GPO Box 1632
Melbourne VIC 3001

Investigation into Steel Reinforcing Bar exported from the Republic of Korea

Dear Director,

This submission is made on behalf of Daehan Steel Co., Ltd. (Daehan) in response to the comments provided by the applicant to the Commission's export verification report.

Disclosure of grade comparison

Daehan is perplexed by the applicant's view that *'[t]he public file version of the Daehan report does not permit the reader to understand whether the grade of steel used by the Commission for domestic sales purposes was the same as for export.'*

The public version report clearly states in bracketed text on page 8:

[Explanation of model matching made between models exported to Australia and those models sold on the domestic market. Model matching was made on the basis of a minimum yield strength of 500 MPa, form (coil or straight) and diameter.]

Barter sales

Daehan is again puzzled by the applicant's query as to whether barter sales were excluded from the determination of normal value. The public report clearly states that barter sales were not sales in the ordinary course of trade and that normal values were established under s.269TAC(1) of the Act, being sales of like goods made in the ordinary course of trade.

Further, all adjustments were based on relevant domestic sales used in establishing normal values under s.269TAC(1) of the Act.

Adjustments

The applicant's statement regarding technical support amount to vague assertions which reflect a fundamental lack of understanding of the claimed adjustment. Daehan's adjustment

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claim in respect of technical support, as confirmed and verified by the Commission, relates only to incurred expenses relating to domestic sales of like goods.

Likewise, the adjustment for inventory carrying costs properly reflects the verified difference in incurred expenses between domestic like goods and the exported goods.

The applicant queries whether the determined normal values were based on domestic sales of rebar coils or rebar straights. As noted earlier, the public report states that the model matching was made on the basis of yield strength, form (coil or straight) and diameter.

Export sales to Australia

The applicant seeks further information with respect to entities involved in the exportation of the goods to Australia, and questions whether further adjustments are required as a result. Information relevant to the exportation of the goods by Daehan is confidential and may not be disclosed on the public record. Daehan has provided all relevant information to the Commission, which has been subsequently verified and found to be complete and accurate.

Yours sincerely,

John Bracic