



Anti-Dumping Commission
Customs House
5 Constitution Ave
CANBERRA ACT 2601

Mr Daniel Moulis
Moulislegal
1/2 Brindabella Circuit
Brindabella Business Park
Canberra International Airport ACT 2609

By email: daniel.moulis@moulislegal.com

Dear Mr Moulis

**INVESTIGATION INTO THE ALLEGED DUMPING OF
POWER TRANSFORMERS - USE OF ALTERNATIVE APPROACH TO
DUMPING MARGIN ASSESSMENTS**

I am writing again in relation to the potential use of an alternative approach to dumping margin assessments in terms of subsection 269TACB(3) of the *Customs Act 1901* in respect of your clients:

- ABB Thailand; and
- ABB Vietnam.

In your letter dated 9 October 2014 on behalf of ABB Thailand you suggested that the Commission should “...engage with ABB Thailand if it does require any specific item of information or clarification of any matters put to the Commission...”. I propose a meeting between the Commission and representatives of ABB Thailand and ABB Vietnam for that purpose.

I suggest the following broad agenda items:

- procedural fairness;
- clarification of the “full cost modelling” information already provided by ABB Thailand and ABB Vietnam; and
- using export price/CTMS ratios to assess whether “export prices differ significantly”.

In relation to requirements for specific items of information, I would like to request that ABB Thailand and ABB Vietnam provide the Commission with evidence of the “full cost model (“FCM”) at quotation” for all transactions involving exports of the goods to Australia in the investigation period. It would be much appreciated if such evidence could be provided in advance of any mutually agreed meeting.

May I suggest a meeting at the offices of the Commission in Canberra on Monday, 27 October 2014.

I look forward to your response.

Yours sincerely



Geoff Gleeson
Director, Operations 1
Anti-Dumping Commission

20 October 2014