DEF. DOC. #1693 Translated by Defense Language Branch INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST THE UNITED STATES OF A TERICA, et al -V8-ARAKI, Sadao, et al Sworn Doposition Deponent: KUWABIR... Yoshiki Having first duly sworn an oath as on attached shoot and in accordance with the procedure followed in my country I hereby depose as follows. 1. My name is KUm.B.R., Yoshiki. I reside in FUJIS.W. City, KAN.GAMA Prefecture. I commenced service with the Japanese Novy in 1921 and continued until the termination of the War. My duties were that of a construction technician and I was engaged in later years in installing equipment in the South See Islands as a member of the YOKOSUK. Naval Construction Department. My duties there dated from November, 1939. 2. In November, 1939, I went on an investigation tour to the South Sea Islands. Prior to 1939 sirdromes for scaplanes and landplanes had been built in the South Seas Area on the islands of Saipan, Pagan, Palau, Ponapo and Truk. They were very small, incomplete, and almost completely lacking in officiency when I saw them. The purpose of my investigation -1 -

- was to report back as to what installations in the way of air fields and harbor equipment were needed in the Islands.
- 3. I went to the Marshall area as Chief of Construction in January, 1940, and was engaged in planning the establishments there, including a heavy-oil tank of 5,000 ton capacity on Taluit; an airdrome for seaplanes, a radio station, barracks, and warehouses on Imej; an airdrome for seaplanes, a radio station, barracks, and warehouses on Kwajalein; on airdrome for landplanes, a radio station, barracks, and warehouses on Rotto; airdromes for landplanes and seaplanes, a radio station, barracks, and warehouses on Wotje. It is true that these airdromes were capable of being used by airplanes either of commercial companies or of the Navy itself. Actually, the use of the airdromes on Imej and Kwajalein was commenced by the NIPFON Air Navigation Company in 1941.
- 4. The building of these installations was under the Navy's direction.

 It was not at all positive and could not be considered as preparation for war. If it had been a preparation for a war, installations for defence containing firearms, and those for supply of ammunitions and food would have been necessary. As it was, each island had only very inferior temporary facilities. In addition working conditions were very poor, and, many workers became ill due to the shortage of food and clothing. I appealed to the Navy Department to send additional help, but the department answered that military supplies could not be sent because the construction work there was neither a military undertaking nor war time activity. Therefore everyone supplied his own needs.

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On the various islands on which I worked, harbor construction was pitifully inadequate. At the works around the Marshall Islands, the distance between the position of encharage and the landing piers varied from two to three miles generally and the transportation of goods was made by lighter. The work around the Islands was further handicapped by the lack of more than two or three lighters. As the piers were mostly temporary constructions made of wood, and the water depth was only about 1.5 meters, the transportation of heavy goods was impossible.

- Truk around April, 1941 and was connected with the transportation of materials for work in the entire South Seas area. I often went to the Tarahalla by ship or sirplene and I have full knowledge of the situation there. I worked around Truk until May, 1942. After the commencement of the war, of course, increased efforts were made by the Navy to install additional facilities or to improve those which were already on the islands. It was impossible to land cannons because of the inedequacy of landing equipment.
- 6. I have been shown Prosecution Document 6254-C. Court Exhibit 1253-C. which is a blueprint of constructions pertaining to Wotje Island made by a person in charge of planning in the YOKOSUKI. Naval Construction Department. Every year, in order to make up a naval budget in proper and logical form, certain plans and preparations were made on paper. It did not mean, and usually was not the case, that these plans were

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ever actually used. This map was not an execution-map ---- that is, it is not the map from which actual buildings would be constructed.

I have no doubt that this map was based on other maps and reports which I had sent from the field to the Construction Department. The actual work on this Island was constructed from an entirely different map.

I signed it as the chief.

On the map of Notje which was shown to me, there were gun-batteries, trenches, blockhouses, pillboxes and wire on the beach. However before the outbreak of the war, in December, 1941 nothing was installed but anti-circraft guns of 12.7 cm. calibre amplaced in two spots. These anti-circraft guns were only temporarily emplaced, and, as far as I knew, little ammunition was prepared. The radio transmitter building was constructed prior to 1939 by the South Seas Bureau and it was utilized for civilian purposes.

- 7. ABISA, in his Deposition (I.F.S. #6032, Court Exhibit #902), states that the Japanese cut trees on Imej island to make a place for the air field and installed guns in 1938. However this is different from the fact.

 It was in 1940 that the construction of the seaplane ramp was commenced on the same island.
- 8. Netives were engaged in the work on the Marshall Islands, but they were never compelled to labour. They were collected to be hired by the South Seas Bureau. Reasonable wages were paid to them, and the wounded were treated in the same way as the Japanese wounded. They were never