

EXHIBIT No. 3010

(22)



INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

THE UNITED STATES OF AMERICA, et al

- VS -

ARAKI, Sadao, et al

Sworn Deposition

Deponent: Ryunosuke KUSAK

Having first duly sworn an oath as shown on attached sheet and in accordance with the procedure followed in my country I hereby depose as follows:

1. My name is Ryunosuke KUSAKA. I was formerly a Vice Admiral in the Japanese Navy and participated in the Pearl Harbor Attack 8 December 1941, as Chief of Staff of the First Air Force Fleet.
2. As has been stated, the plan of attack was originated by Admiral Isorofu YAMAMOTO, Commander in Chief of the Combined Fleet, around January of 1941. I remember it was April or May of that year and after I had been assigned to the post of Chief of Staff of the First Air Force Fleet that I learned of the plan. Generally speaking, the Pearl Harbor Attack was a hazardous and speculative operation penetrating deep into enemy lines. Since it was considered too venturesome, as a first step in military operations which decided the fate of the State, various studies were repeatedly made. However, since I could not agree with Commander in Chief YAMAMOTO's idea as I did not consider the plan to be practical, I expressed a lengthy opposition opinion directly to the Commander in Chief himself.

Commander in Chief YAMAMOTO listened carefully to my opinion and then said as follows:

"I fully understand your opinion; however if war should break out with the United States, taking into view the condition of military strength as it stands today, I have no confidence in fulfilling the responsibility of our national defense other than by attacking the United States Fleet immediately after the outbreak of war. Therefore, as long as the United States Fleet is stationed at Hawaii, it is my conviction as Supreme Commander, that we must commence operations by an attack there. I ask you, then, to stop opposing me from now



on and concentrate your efforts toward securing the success of this attack."

3. The Naval General Staff in early October 1941, in spite of its previous opposition to the plan, gave way before the firm opinion of Commander in Chief YAMAMOTO and finally consented to study the Hawaii Operation so that preparations could be made for any emergency situation that might arise. Subsequently, joint studies were made between the Naval General Staff Operations Section, staff officers of the Combined Fleet and the First Air Force Fleet. As studies of the operation advanced, the atmosphere gradually changed to the point of view of adopting the Hawaii Attack Plan as the first priority plan. This was largely due to the fact that the Combined Fleet Headquarters was so strongly convinced of its possibilities as compared with the disadvantage of having to plan a counter attack strategy against the enemy for the purpose of protecting the undefended South Sea Islands.

4. At that time there was only one carrier based air force fleet which was the First Air Force Fleet consisting of the following three air force squadrons:

First Air Force Squadron with aircraft carriers ARAGI and KAGA

Second Air Force Squadron with aircraft carriers SORYU and HIRYU.

Fourth Air Force Squadron with aircraft carriers RYUJO and the converted carrier "Kasuga Maru", named the "Taiyo."

At that time there were also the light aircraft carriers "Hosho" and "Zuiho" which formed the Third Air Force Squadron of the First Fleet.

On September 25th, 1941, the aircraft carrier "Zuikaku" was commissioned and, together with the aircraft carrier "Shokaku", which had been completed one month before, composed the Fifth Air Force Squadron. These were assigned for service under the First Air Force Fleet.

5. Of the four air force squadrons attached to the First Air Force Fleet, both carriers of the Fourth Air Force Squadron were capable only of carrying a small number of planes and those planes were out moded craft. They were slow with a short cruising range and entirely unfit for the Hawaii Operation. Therefore, the



Combined Fleet Headquarters submitted the following demands to the central authorities.

(a) Select highly trained air crew members from both carriers of the Fourth Air Force Squadron to fill vacancies in the First and Second Air Force Squadrons, thereby increasing the number of carrier planes on both air force squadrons and particularly the number of fighter planes.

(b) Fill the vacancies in the Fifth Air Force Squadron with trained personnel, experienced in service on carriers, from land air force units.

Concerning the two above items, there was no other way to supply men for item (b) other than to pull out training officers and enlisted men instructors from the training corps. The Personnel Bureau Naval Aviation Board showed great reluctance to do this because it would inconvenience the training and supplying of future air crew personnel. The demands of the Combined Fleet, however, were strong enough to enforce its wishes and it was finally done.

6. The Pearl Harbor Attack was thus conducted by a temporarily organized task force consisting of the First Air Force Fleet as its main body. It was mid October 1941 when the shifting of necessary personnel and the formation of the First Air Force Fleet was completed. Because the Pearl Harbor Attack was not thought possible unless rigid training be enforced, it was necessary to carry out practice schedules until late November. But as the embarkation date was around the middle of November, it left port without even a month's training.

As a result of studies made on the Pearl Harbor Attack Operation, daylight, or if possible, before daybreak, as the time of attack was desirable. But due to such circumstances as the insufficient training of air crew personnel, the accompanying lack of confidence in taking off from the carriers and flying in formation, together with navigating before daybreak, were problems which caused a change in the schedule of the attack so that it



was finally arranged for the planes to leave the carriers thirty minutes before daybreak and to fix the hour of attack at one hour and a half after daybreak.

The Pearl Harbor Attack was an extremely difficult operation and its major difficulties were the following two points:

(a) The problem of a shallow submersion torpedo.

Previous studies had been made to lessen the submersion degree of torpedoes after firing and to shorten the distance required to stabilize itself at an adjusted depth. These studies were made before the Pearl Harbor Operation was conceived and were designed for the purpose of aerial torpedo attacks on shipping. The results were far from satisfactory. When studies on the Pearl Harbor Attack began, research work in this field became more important for it was an unanswered question as to whether aerial torpedo attacks were possible in the restricted and shallow waters of Pearl Harbor. The First Air Force Fleet, with the cooperation of the Yokosuka Naval Air Corps and Naval Air Technical Department made repeated experiments and finally, in late October, reached the conclusion that it was possible.

The remodeling of torpedoes necessary for such operation was delayed and they could not be delivered to the ships before embarking for their rendezvous point at Takan Bay. So the aircraft carrier AKAGI stayed behind until the last to receive the remodeled torpedoes and then to distribute them to each ship at Takan Bay. There was also the question of torpedo net cutters which were thought to be necessary for the operation but, although the research work was hurried, the studies and experiments did not produce satisfactory results and it was decided not to equip the torpedoes with cutters.

(b) The second difficulty was the problem of extending the cruising range of the ships participating in the attack. The attack force took a northerly course where navigating ships were scarce in order to avoid early discovery and planned to approach Hawaii from the north where we thought air patrols would be



sporadic.

It was the northeastern monsoon period and we knew that the aircraft carriers AKAGI, SORYU and HIRYU, as well as the destroyers, would not have sufficient cruising range if refueling en route was impossible due to the strong winds and high waves. As for refueling destroyers on the high seas, we had had considerable training and experience and in the event refueling was impossible, these ships could turn back and the operation be carried on by cruisers and heavier type ships.

The problem was different in regard to aircraft carriers. If three out of six participating were omitted, the operation could not be performed. Consequently, after many studies were made, it was decided to carry fuel even in the double bottomed sections and stacking fuel drums outside the storage rooms. Then, in case refueling was impossible, these ships would be able to return to a point at 160° east longitude.

However, loading fuel into the double bottomed sections of the aircraft carrier AKAGI and also the reserve fuel tanks was prohibited by naval regulations considering the strength of the ship's structure. I therefore entered into negotiations with proper officials, attempting to neutralize this naval regulation, but achieved no success. Whereupon the Commander in Chief of the Fleet was forced to take full responsibility regarding the possibility of an accident occurring and the decision was made to load fuel in the reserve fuel tanks and double bottom sections, although not in compliance with regulations.

The Task Force which was temporarily organized for the Pearl Harbor Attack was to embark from their port either alone or in small groups around 15 November 1941 in accordance with Combined Fleet Headquarters orders, and rendezvous at Takan Bay by 22 November. After refueling, the Task Force left the bay at 0600 hours 26 November to the next stand-by point at 42° north latitude, 170° west longitude.

During this operation, there were two important problems which



caused me great concern in my capacity of Chief of Staff of the Task Force.

One was whether or not the main body of the United States Fleet would be stationed in the Hawaiian area at the time the attack was to be made. The other was the fear of enforcing the attack when orders to return might have been transmitted (if United States - Japanese negotiations reached an amicable settlement) but which might not be received owing to the remote distance of communications or other causes. It would indeed have been a grave problem had orders been dispatched to return and were not received by the Task Force.

Behind the reason for my concern on the latter point was the fact that on 2 December, Imperial Headquarters Naval Section orders stated that diplomatic negotiations would be continued even after a decision was passed designating 8 December as the day to open hostilities, and a ray of hope that hostilities could be avoided was still seen. If United States - Japanese negotiations reached an amicable settlement, or a possibility of reaching a peaceful solution became a certainty, all forces were to stop all operational actions and, after hurriedly rounding up all units, were to return home. This was so indicated in Imperial Headquarters Naval Department Instruction Number 5 and concurrently in Combined Fleet Headquarters Instruction Number 1. (In the instruction the words "In the event of important change in situation meant the amicable settlement of United States - Japanese negotiations.) Moreover, we had heard of this matter from Commander in Chief Admiral YAMAMOTO at every opportunity. Therefore, I was greatly concerned until on the 5th or 6th of December I received a telegram from Chief of Division One, Naval General Staff, stating that there was no hope of United States - Japanese negotiations coming to a peaceful conclusion.

10. As for the ultimatum to be delivered prior to the attack, I thought it was naturally being taken care of by the central authorities. Therefore, I was convinced that a notification



had been communicated before the attack began.

From a strategical viewpoint, an attack without notice might be idealistic, but such treacherous action was unthinkable from the point of view of training and common sense of the Japanese naval officer, and also because of the traditional 'Bushido' (the creed of the Samurai).

As a matter of fact, I expected the possible discovery of our operation before the attack by United States patrol planes in Hawaii. Our observation sea planes were scheduled to arrive at Pearl Harbor at least thirty minutes ahead of the attacking forces, and moreover, we were expecting our attacking forces to be caught by radar, thus revealing to the United States our potential attack. We actually were prepared to suffer considerable damage and casualties in this risky undertaking and were greatly surprised when such did not occur.



On this \_\_\_\_\_ day of August, 194

At Tokyo.

DEPONENT: KUSAKA, Ryunosuke (seal)

I, KUSAKA, Ryunosuke hereby certify that the above statement was sworn by the Deponent, who affixed his signature and seal thereto in the presence of this witness.

On the same date

At the same place

Witness (signed) OKUYAMA, Hachiro (seal)

OATH

In accordance with my conscience I swear to tell the whole truth withholding nothing and adding nothing.

KUSAKA, Ryunosuke (seal)