

EXHIBIT No. 2995

(16)



INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

THE UNITED STATES OF AMERICA, et al

-vs-

ARAKI, Badao, et al

A F F I D A V I T

of

SUZUKI, Suguru

1. My name is SUZUKI, Suguru. I hold the rank of Commander in the Japanese Navy and between the years 1937 and 1939 I served as Flying Section Officer of the Yokohama Naval Air Force. I was required to assist in the training of personnel for the Nippon Airline Company, a privately owned concern which was planning to open a regular air route to the South Seas Area. It was planned to use heavy flying boats which demanded that new personnel be taught maintenance, air navigation and piloting of such heavy craft. Since even the Navy itself possessed few men with definite knowledge in this field I was assigned to serve as instructor.

2. In pursuit of my assignment, in August of 1938, I made an inspection tour of the Inner South Seas Island area visiting many of the Mandated Islands. Later, also in the course of my



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duties, it was necessary to fly directly down to the islands for the purpose of making a survey for potential landing facilities on the islands. I received no instructions from the Navy to assist in this work for the purpose of establishing potential military air fields and I emphatically emphasize the fact that they were considered only for civilian commercial purposes for the use of the Nippon Airline Company.

3. In December of 1939 I was appointed Staff Officer of the newly organized 4th Squadron of the Japanese Navy. My duties pertained to matters dealing with aviation and communications. Again I toured the Inner South Seas area, this time aboard ship visiting many of the Mandated Islands. I made over-all studies of the Mandated Islands to the end of drafting plans for military defense that might be employed in the event of possible hostilities. This did not mean that the intention was present to fortify the Mandated Islands but only that the necessary plans and preparations to properly defend said islands would be on hand and available in the event their use was necessary. Military men will understand this to be a necessary procedure. At no time during my many visits to the Mandated Islands which included Saipan, Kwajalein, Wotje, Jaluit, Taroa, Truk and Palau did I observe any military fortifications or constructions that might be classified as military installations. To the contrary, it appeared to me that Japan was being extremely lax in taking necessary precautionary measures which they rightfully could have done



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even under treaty specifications.

4. In April of 1940 I was relieved of my assignment and enrolled at the Naval Staff College as a student officer. Therefore, after this date I truthfully can not testify from personal observations as to the conditions on the Mandated Islands. I can say that when I returned to Japan at this time I submitted a plan, in documentary form, to the Naval General Staff setting forth my ideas on potential defense preparations that should be made regarding the South Seas Island area. It may well be that the blueprint map of potential installations on Wotje Island, dated August 10, 1940, and introduced as Prosecution evidence in this case was the result of some of the suggestions made in my report. I wish to stress that they were merely plans of potential action to be taken and were not in any way concrete schedules to be actually executed.

In regard to the establishing of air fields on several of the Mandated Islands, I wish to state that the Nippon Airline Company desired to begin trial flights on its new commercial run in September of 1938. In order to make this possible, it was necessary to construct simple sea plane ramps to accommodate the 4-engine heavy flying craft. As I stated previously, the supply of pilots for this type of aircraft was extremely limited and that the only source of instruction for potential



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pilots had to come from the Navy. Even in the Navy itself there were very few men who could handle such large ships. The first group to receive training consisted of four pilots, two wireless operators, two mechanics and a number of ground mechanics. The number was gradually increased and by the end of 1939 eight pilots had completed the training course. They were all civilians, two of which were reserve naval petty officers. Landing facilities for the planes were established at Arakebesen Island in the Palau Group and nearly completed in late 1938. At Saipan Island a temporary slip had been built and it was not until late 1938 that a concrete slip and a small sized hangar was installed. If my memory serves me correctly there was an improvised air field on Saipan which was little more than a leveled off bit of farm land. At Yap Island there were no facilities to lift or lower planes and only buoys were used.

5. The Nippon Airline Company was a privately owned concern receiving subsidies from the government. The reason for this was during this time it was difficult for the company to sustain itself in such an early period of development with income dependent solely on passenger traffic and freight charges. Since it was deemed advisable, from purely a commercial point of view, to promote a rapid development of this type of air travel the government, but naturally, lent



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its assistance.

While I have no knowledge of restrictions placed against foreigners visiting the Mandated Islands I do specifically recall that in 1939 I was refused the privilege of visiting Guam which was of course an American possession. It was proposed to visit Guam for the purpose of discussing and airline junction between the Nippon Airline Company and the Pan Pacific Airlines. The refusal came from the American Embassy in Tokyo. I recall during the early part of 1940 our planes directly encountered U. S. patrol Catalina Flying Boats in areas over the Mandated Islands and while our aircraft were in the atolls of the Marshall Group during training flights we encountered many wireless obstructions. These obstructions appeared to be a systematic procedure convincing us - rightfully or wrongfully - that they came from U.S.

Naval sources. Similar wireless obstructions were experienced in communications between our war ships. Again, such incidents as occurred in February, 1940 when a United States naval cruiser wandered outside the port of Saipan at very close range for a period of 50 to 60 minutes caused great mental unrest among Japanese naval circles and indignant reports from Japanese resident on that island were received. Such incidents as these combined with other activities on behalf of the United States Navy during times when great suspicion and anxiety existed between the two countries resulted in a situation which might be described as a psychological war of nerves,



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adding fuel to the argument of exponents of criticism of the Japanese Navy for failure to take precautionary measures in regard to protection of the Mandated Islands.

On this 26day of May, 1947

At I.M.T.F.E

DEPONENT SUZUKI, Suguru (seal)

I, ONO Seichiro 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 I.M.T.F.E.

Witness: (signed) ONO Seichiro (seal)

OATH

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

SUZUKI, Suguru (seal)