

[REFERENCE TRANSLATION]

Please note that this translation is to be used solely as reference and the statements in this material are unaudited. In case of any discrepancy between this translation and the Japanese original, the latter shall prevail.

The proposal for rectification etc. and request for disclosure of administrative documents

On October 2nd, Ministry of Land, Infrastructure, Transport and Tourism (MLIT) released a press release, "Allocation of Haneda Airport's International Flight Slots," regarding the allocation of international flight departure and arrival slots to be added from 2014/03 (hereinafter referred to as "the allocation") at Tokyo Haneda Airport. Although we have requested an even allocation of international flight slots between 2 Japanese international flights operators, we received only 5 slots (United Kingdom, France, China (Beijing), Singapore, and Thailand) out of total 16 slots, which have already been confirmed to be allocated to Japanese carriers. We sincerely regret that we are unable to accept the allocation, as it is unfair and harms passenger convenience and benefit to the national interest.

MLIT states as the reason for the allocation that MLIT intends to restrainedly make judgment on the expansion of new routes, other than new routes explicitly described in the JAL Group's mid-term management plan (FY2012-FY2016), and the allocation will be determined based on whether the given new routes, would meet the criteria. However, MLIT did not specifically explain why new criteria have been abruptly established, why newly established routes at Haneda Airport might impede or skew an appropriate competitive environment.

As we have stated the above, the allocation diverges greatly from an even allocation, and we strongly request for the even allocation since we believe there is no justification for this decision.

Concurrently, we need to analyze how MLIT had been discussing the allocation and the reason for the decision mentioned above. Therefore, we request MLIT to explain concrete reasons and details of the discussion to come to the above conclusion as well as to answer questions stated in the attached in timely manner.

Pursuant to Article 3 of Act on Access to Information Held by Administrative Organs, we also request to disclose the administrative documents mentioned below.

- 1) Any minutes, documents, or pictures, and electromagnetic record regarding the process of discussion on the allocation of Haneda Airport's International Flight Slots
- 2) Any documents, drawings or pictures, and electromagnetic record created in the process of discussion on the allocation of Haneda Airport's International Flight Slots
- 3) With regard to the allocation of Haneda Airport's International Flight Slots;
 - Any documents, pictures, and electromagnetic record MLIT received from third party
 - Any documents, pictures, and electromagnetic record MLIT provided to third party

Questions to MLIT

1. Maximization of passenger convenience

Did MLIT evaluate that the announced allocation, rather than the even allocation, contribute to maximize passenger convenience? If so, what is the reason for the evaluation?

2. Competition among the global alliances

Did MLIT consider the impact of the allocation on the competition among the global alliances? If so, please state the detail of the impact MLIT considered.

3. Judgment with Ex-post restraint

MLIT mentioned in the allocation policy that MLIT intends to restrainedly make judgment on the expansion of new routes, other than new routes explicitly described in the JAL Group's mid-term management plan (FY2012-FY2016). However, this is different from the stand point shown in the statement in the Statement by the Civil Aviation Bureau on August 10, 2012, where it is only stated that "during the period of JAL's mid-term management plan, in order to confirm that the competitive environment is not being unevenly skewed, the Civil Aviation Bureau will, periodically or to the extent necessary, request reports from JAL regarding its investment and route expansion plans and monitor the status of such plans."

Why did MLIT adopt such further restraints at this stage? Did MLIT consider how such additional restraints would affect the competition? If so, please state the detail of the consideration.

4. Restriction standards on establishing new routes

From a competition standpoint and volatility in supply and demand environment, it is very difficult to clearly determine the route network for long-term plan ; thus, in practice, it is impossible to explicitly state planned new routes in our mid-term management Plan for 2012-2016.

Please state the reason why MLIT established the criteria to make restrained judgment on the expansion of new routes, other than new routes explicitly described in the JAL Group's mid-term management plan.

5. Definition of "unevenly skewed competitive environment"

The allocation policy states that MLIT will determine whether the competitive environment is unevenly skewed. Please specifically explain the implication of "unevenly skewed competitive environment."

6. Presence and magnitude of "unevenly skewed competitive environment"

Does MLIT judge the current competitive environment is "unevenly skewed "? If so, please quantify the magnitude of the "uneven skew on the competitive environment".