

Q1: Has the Regulation had any impact on the insurance policy of air carriers? Do air carriers just comply with the minimum insurance requirements or do air carriers carry insurance above the minimum insurance requirements?

The Japanese airlines have purchased their insurance cover by higher limit than the minimum insurance requirements. The Regulation has had little impact on the insurance policy of Japanese airlines.

Q2: What has been the economic impact of the Regulation on general aviation operators?

There are almost no Japanese commercial general aviation operators and /or I.A. operators flying within, into, out of, or to a certain extent over EU territory as of this moment.

Q3: Does the insurance market provide reasonable cover for historic aircraft, taking into account the limited usage and relative low risk of third-party damage caused by such aircraft? What could be a more appropriate and proportional insurance requirement for historic aircraft?

There are almost no historic aircraft in Japanese aviation field after World War II, and not flying within, into, out of, or to a certain extent over EU territory.

Q4: Is there still a need for the requirement for aircraft operators to have insurance cover for damage to third parties due to risks of war or terrorism in respect of non-commercial operations?

In respect of non-commercial operations, there are not any special requirements for such aircraft operators to have insurance cover for damage to third parties due to risks of war or terrorism in Japan.

Q5: Is there a need to introduce specific rules for the insurance requirements for damage caused by unlawful interference while the aircraft is still at the airport in order to allow insurers better control over possible liability exposure?

We don't think it's necessary to introduce specific rules for the insurance requirements for damage, caused by unlawful interference while the aircraft is at the airport etc.

Q6: Do air carriers licensed in third countries and aircraft operators using aircraft registered outside the EU usually deposit an insurance certificate or do they provide other documentation? What kind of documentation other than a deposit of an insurance certificate is provided by air carriers and aircraft operators and accepted as evidence of compliance by Member States?

The Japanese aircraft operators usually provide an insurance certificate.

Q7: Would there be benefits of creating a universal EU insurance certificate for air carriers and aircraft operators?

A universal EU insurance certificate for air carriers and aircraft operators might be helpful.

Q8: Which insurance requirements apply in Member States for the passenger liability in respect of non-commercial operations by aircraft with MTOM of less than 2,700 kg? Do different insurance requirements in these cases cause problems for aircraft operators?

There are not any insurance requirements for the passenger liability in respect of non-commercial operations by aircraft with MTOM of less than 2,700 kg.

Q9: Have there been any problems with the application of Regulation 889/2002?

We don't think so.

Q10: Is there a need to harmonize third-party liability rules for Community air carriers for risks linked to war and terrorist acts?

The common rules would be preferred if any, but we presume it might be difficult to harmonize them.

Q11: Is the Regulation still necessary to ensure a level playing field with third-country air carriers or would there be more effective alternatives, for example, in the context of Community aviation agreements with third countries?

We don't think Japanese general aviation operators have appropriate interest on it.

Q12: Would the insurance market be able to provide insurance coverage to air carriers in order to refund passengers for the sums paid and to cover the costs of repatriating passengers if the carrier is not able to operate the flight because of insolvency or revocation of its operating license?

Such risks might be written by a specialized insurer, but not by the standard insurance market.

Q13: Would additional insurance requirements be an appropriate instrument to protect passengers in such cases or are there other more effective and efficient means?

We wonder if there could be effective insurance or other more effective and efficient means for such cases.

Q14: Is there scope for simplification of the Regulation?

We think there is , but it depends upon how the concerning parties would agree.

Q15: Is it still seen necessary to have harmonized insurance requirements for non-commercial aircraft operators? What would be the impact of exempting non-commercial aircraft operators from the scope of the Regulation?

We would not be eligible enough to answer, as Japanese non-commercial aircraft operators did not have appropriate interest on it.