Adopting the "Government and Binding Theory" outlined in Chomsky (1981), Takezawa (1987) proposes that nominative Case in Japanese, on a par with that in English, is licensed by finite T. This analysis has been carried over into a minimalist framework (Chomsky (1995, 2000, 2001)), with the Case-licensing mechanism reduced to the agreement system (see e.g. Tada (1992), Ura (1999), Mikami (2009)). Fukui and Takano (henceforth, F&T) (1998), in contrast, develop the overt particle system for Case assignment, which is based on the hypothesis that they refer to as the "Symmetry of Derivation." Under this system, Japanese, unlike English, licenses Case through a mechanism independent of agreement (see also Kuroda (1978, 1988), Saito (1982)). These two analyses on Case assignment in Japanese are at extremely opposite ends in that the former builds on the agreement system but the latter does not at all. In this joint research, adapting F&T's analysis from the perspective of the theory of feature inheritance (Chomsky (2008)), we demonstrate that both analyses are actually demanded, showing that Japanese employs both the agreement and nonagreement system for Case assignment.

Let us begin by reviewing the overt particle system for Case assignment in Japanese. F&T (1998) establish this system by reinterpreting the "head-parameter" in light of parametric variation in functional categories between English and Japanese (cf. Fukui (1995)):

(1) v has the property of attracting V in English but not in Japanese.

According to (1), functional categories in Japanese, if any, are not "active" unlike counterparts in English, which is in line with the traditional view but is in contrast with Kayne's (1994). This means that the OV order in Japanese reflects the underlying property, involving no verb raising, whereas the VO order in English derives from overt V-to- $\nu$  raising.

Assuming that V rather than v bears [assign accusative Case (Acc)] and that feature checking is implemented via v, F&T argue that Japanese, which lacks overt V-to-v raising unlike English, cannot utilize a Case-licensing mechanism drawing upon feature checking. This claim leads them to propose the overt particle system, under which [uCase] on accusative elements and [Acc] on transitive verbs are each 'checked' in a different manner from feature checking:

(2) a. The Case particle makes the Case feature of a noun phrase visible

to Spell-Out.

b. Linking to a particular  $\theta$ -role makes the Case feature of a transitive verb interpretable at LF.

(2a) states that the existence of an overt Case particle in Japanese enables its phonological feature to associate with [uCase] on a nominal element and Spell-Out to remove [uCase] from a syntactic object that is to be transferred into LF, hence the relevant derivation converges. As described in (2b), on the other hand, [Acc] on a transitive verb needs not be deleted because it links to a  $\theta$ -role (cf. Takahashi (1993)), which is interpretable at LF. UG can thus eliminate Case features either via checking (e.g. English) or via Spell-Out (e.g. Japanese).

The proposed system can be extended straightforwardly to nominative Case with respect to (2a), but that is not the case with (2b) because finite T, which is generally assumed to check [uCase] on a nominative element, is not a  $\theta$ -role assignor. This amounts to stating that [assign nominative Case (Nom)] on T can be eliminated neither by checking nor by Spell-Out. Thus, F&T reach the conclusion that T in Japanese does not have [Nom] and that nominative *ga* behaves like a default Case (cf. Saito (1982), Fukui (1986, 1988), Fukui and Nishigauchi (1992)).

The outlined analysis is attractive in that it has some significant consequences but is problematic in that it is founded on some nontrivial assumptions. First, the claim that [Acc] is located in V rather than v is conceptually unnatural, as F&T (1998: note 24) accepts. Then, empirically, it is unclear whether [Acc] on a transitive verb always links to a particular  $\theta$ -role (cf. (5)).

To overcome the theoretical unnaturalness just mentioned, we adopt the mechanism of feature inheritance (Chomsky (2008)), in which the Agree feature (i.e. a tense-feature and/or  $\varphi$ -feature) is inherited from C to T and from v to V. This mechanism allows V to have [Acc] naturally in a derivative fashion. Although English establishes a Case-licensing mechanism drawing upon feature checking via verb raising, Japanese does via feature inheritance. In other words, V serves as an accusative Case licenser in Japanese, but v does in English. This analysis implies that (2b) is no longer needed to render [Acc] on a transitive verb interpretable at LF. With respect to the need for (2a), however, there is room for discussion left. In the subsequent discussion, we confirm that Japanese can license Case in the following complementary way: the Case licensers T and V, c-commanding a nominal element, assign it structural Case under the agreement system; otherwise, a nominal element is assigned special 'structural' Case under (2a) in compliance with a domain into which it merges (cf. Saito (2007), Takano (2011)).

Let us now observe multiple nominative constructions:

- (3) a. Bunmeikoku-ga dansei-ga heikin-jumyou-ga mijikai.
  civilized country-Nom male-Nom average-lifespan-Nom short
  "In civilized countries, males' average lifespan is short."
  - b.  $[_{TP} Bunmeikoku-ga_{[uCase]} [_{TP} dansei-ga_{[uCase]} [_{TP} heikin-jumyou-ga T_{[Nom]} [_{AP} <heikin-jumyou-ga_{[uCase]} > mijikai]]]]$

It is well known since Kuno (1973) that Japanese admits multiple occurrences of nominative Case in a single sentence, as illustrated in (3a). Here, (3a) is assumed to be assigned the structure in (3b). In this structure, the lowest nominal phrase originated in the predicate-internal position is permitted to receive nominative Case by establishing a c-command relation with T. By contrast, the higher nominal phrases adjoining to TP are assigned nominative Cases via Spell-Out (cf. (2a)). Based on the difference in grammaticality between (4a) and (4b), we are able to corroborate the existence of these two ways for licensing nominative Case.

- (4) a. Tsukuba-Daigaku-ga <u>gakutyou-ga</u> ta-daigaku-o Tsukuba-university-Nom president-Nom other-university-Acc shisatsu-sare-ta. inspect-SH-Past "The president of the University of Tsukuba inspected another university."
  - b. \*<u>Yamada-sensei-ga</u> musuko-ga ronbun-o o-yomi-ni-natta. Yamada-prof.-Nom son-Nom article-Acc SH-read-become-Past "Prof. Yamada's son read an article."

In (4), the underlined phrase is meant to undergo subject honorification (cf. Harada (1976), Shibatani (1990)). Toribio (1990) takes this sort of honorification to be an instance of a  $\varphi$ -feature agreement relation with T. If we adopt this perspective, the grammatical contrast in (4) falls into place in conjunction with our analysis. The underlined phrase in (4a), which is the lower nominal phrase in the predicate-internal position, enters into a  $\varphi$ -feature agreement relation with T, thus undergoing subject honorification. Contrastingly, the underlined phrase in (4b) is outside the c-command domain of T, so it fails to undergo subject honorification. This contrast indicates that there are two ways for licensing nominative Case. The existence of these two types of Case-licensing mechanisms is also clear from other diagnoses for subjecthood: interpretation of *jibun* and control of PRO.

Further demonstration stems from the *nani-o* X-*o* construction (cf. Kurafuji (1997), Konno (2004), Takami (2010), etc.):

(5)	a.	Nani-o	bakagetako	oto-o itte-i-ru	n	o?	
		what-Acc	rubbish-Ac	c say-Prog	g-Pres Q	)	
		"Why do you talk rubbish?"					
	b.	[vP Nani-o[uCase] [vP v[Acc] [VP bakagetakoto-o[uCase] itte-i-ru no]]]					
(6)	a.	*Nani-o	omae-ga l	oakagetakoto-o	itte-i-ru	no?	
			you-Nom				
	b. $*[_{TP} Omae-ga [_{\nu P} nani-o [_{\nu P} < omae-ga > bakagetakoto-o itt$						

(7) a. ??Who do you think that [yesterday [John met <who>]]?

b. \*How do you think that [yesterday [John met <how>]]?

As exemplified in (5a), this construction contains two occurrences of accusative Case and signifies a colloquial interrogative as a whole (cf. Konno (2004)). The lower accusative phrase works as the complement of the verb *iu*, and the higher one behaves like a wh-adjunct, which is not required by argument structure. This suggests that sentence (5a) has the structure in (5b). In (5b), the lower accusative phrase is assigned accusative Case, entering into a  $\varphi$ -feature agreement relation with v; in contrast, the higher accusative phrase, which is outside the c-command domain of  $v_{1}$ , obtains accusative Case via Spell-Out (cf. (2a)). The ungrammaticality of (6a) confirms that the higher accusative phrase, unlike the lower one, is assigned accusative Case by means other than establishing a  $\varphi$ -feature agreement relation with v. As indicated in (6a), the *nani-o* X-o construction refuses the appearance of a subject element with nominative Case. This refusal comes from the view that a wh-adjunct in this construction is in accordance with a sentential adjunct such as *yesterday.* Sentences (7a, b) represent the relevant examples. As the deviance of (7) shows, adjunction of sentential adjuncts creates a certain island against extraction (Takano (1990:175-176)). If the same holds for a wh-adjunct in the nani-o X-o construction, the ungrammaticality of (6a) follows. In (6b), the structure for (6a), the nominative phrase crosses over the wh-adjunct whose adjunction yields a kind of island. This movement produces an island violation. That is why there arises no nominative subject in the *nani-o* X-o construction. This strongly suggests that in Japanese, accusative Case is licensed under both agreement and nonagreement system, in parallel with nominative Case.

Adapting F&T's (1998) Case system based on parametric variation in functional categories between English and Japanese (see (1)) in terms of the theory of feature inheritance (Chomsky (2008)), this joint research has proposed that Japanese can license Case by means of both checking and Spell-Out. It is highly expected that closer investigation from this viewpoint helps shed light on various differences between English and Japanese.