2013 National Baseball Arbitration Competition

Dexter Fowler v. Colorado Rockies
Submission on Behalf of Dexter Fowler
Midpoint: $4.3 million
Submission by: Team 10
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I. Introduction and Request for Arbitration Hearing Decision

The following brief will discuss relevant statistics, player attributes, team attributes, awards, and other relevant factors regarding the playing career of 26-year-old center fielder Dexter Fowler (“Mr. Fowler”) of the Colorado Rockies Baseball Club (the “Club,” or the “Rockies”). The Major League Baseball (“MLB”) Collective Bargaining Agreement (“CBA”) between the 30 MLB teams and the MLB Players Association will govern the arbitration proceeding and sets forth the criteria that will be considered in this arbitration hearing.

According to Article VI, Section E, Part 10(a-b) of the CBA, the criteria to be considered includes: (1) the quality of Mr. Fowler’s contribution to the Rockies last season, including, but not limited to his overall performance, special qualities of leadership, and public appeal; (2) the length and consistency of Mr. Fowler’s career contributions; (3) the record of Mr. Fowler’s past compensation; (4) comparative baseball salaries; (5) the existence of any physical or mental defects on the part of Mr. Fowler; and (6) the recent performance of the Rockies, including but not limited to its League standing and attendance as an indication of public acceptance.¹ The following evidence will not be admissible during the proceedings: (1) the financial position of the Rockies and Mr. Fowler; (2) press comments and other similar material on the performance of the Rockies or Mr. Fowler; and (3) offers made by either party prior to arbitration.²

The final team offer in this arbitration matter is for $4 million. The final player request is $4.6 million, thus, the midpoint—and the essential figure in this arbitration—is $4.3 million. In accordance with the CBA, summarized above, this brief will only include such information as is

² Id.
relevant and permitted. Mr. Fowler respectfully asks that this panel carefully consider all of the information included below. The arguments and analysis will demonstrate Mr. Fowler is entitled to receive the $4.6 million requested.

II. Quality of Mr. Fowler’s Contribution During the Past Season

Table 1: Dexter Fowler 2012 Statistics

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Following an impressive finish to the 2011 season, Mr. Fowler continued his upward trajectory by completing the best season of his career in 2012. During the offseason, Mr. Fowler made significant changes to his physique and technique that required some adjustment early on. He added seven pounds of muscle and tweaked his swinging motion. He got off to a slow start, struggling to hit only .149 in spring training and .239 in the month of April.

He soon found his swing, however, and bounced back with a .333 batting average in the month of May. Mr. Fowler’s heroic potential was especially on display in the Rockies’ doubleheader sweep of the Astros on May 28, 2012. His walk off triple in the tenth inning of the nightcap ended not only the game, but his early-season slump as well. Hitting 7-for-9, he lifted his batting average from .237 to .276 in a single day.

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The 2012 Rockies were plagued by injuries and completed their worst record in franchise history, but Mr. Fowler continued to play outstanding baseball as the season wore on. Although he, too, had a few minor injuries throughout the season, he continued to play and did not miss more than two games in a row until the end of the season, when the Rockies were clearly out of playoff contention. He ranked third among all active MLB catchers in batting average for the 2012 season, trailing only Andrew McCutchen and Mike Trout. Mr. Fowler ranked seventh overall in the National League in OBP in 2012, and for the fourth year in a row, he also was among the top 5 for triples in the NL. Clearly the strength he amassed over the offseason has not been a detriment to his speed.

Mr. Fowler led all centerfielders in walk percentage and was 10th in the MLB among qualified hitters, a list full of power hitters who are regularly walked intentionally. Mr. Fowler, the lead off hitter for the Rockies, gets on base 12.8% of the time without ever having to swing a bat. Defensively, Mr. Fowler ranked first among NL center fielders—and fifth among all NL outfielders—with only six errors in the 2012 season.

### III. Length and Consistency of Career Contributions

Table 2: Dexter Fowler Career Statistics

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<td>2009</td>
<td>135</td>
<td>518</td>
<td>433</td>
<td>29</td>
<td>10</td>
<td>34</td>
<td>.266</td>
<td>27</td>
<td>67</td>
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<td>2010</td>
<td>132</td>
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<td>35</td>
<td>15</td>
<td>45</td>
<td>.266</td>
<td>12</td>
<td>68</td>
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<td>.300</td>
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<td>68</td>
<td>.863</td>
<td>.389</td>
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10 Id.
11 Id.
Mr. Fowler was originally drafted by the Rockies in the 14th round of the 2004 MLB draft after completing high school at Milton HS in Alpharetta, Georgia.\textsuperscript{12} He was called up to the majors in September of 2008. In 2009, his first full season of professional baseball, Mr. Fowler had a fantastic rookie campaign, finishing 8th in the Rookie of the Year voting among National League players.\textsuperscript{13} He was sixth in the NL for stolen bases, and fifth in triples. His stellar base running has continued throughout his career, as he has finished in the top five in the NL for triples each year of his career—including first in 2010. Twice he ranked among the NL players caught stealing the fewest times, finishing 6th and 10th in 2009 and 2011, respectively. In 2009, he also finished 4th in the NL for sacrifice hits. His excellent fundamentals have allowed him to improve each year, and Mr. Fowler is certainly has emerged one of the elite outfielders in the MLB.

Mr. Fowler’s batting average and OPS stayed fairly consistent throughout his first three full seasons with the Rockies, hovering near the .266 and .775 ranges, respectively, and increasing slightly.\textsuperscript{14} As mentioned previously, the 2012 campaign served as a major turning point in Mr. Fowler’s career. He broke through this plateau, achieving a .300 average and .863 OPS.\textsuperscript{15} The progress made over his career, combined with the breakthrough he achieved through strength training and mechanics prior to the 2012 campaign, will only continue in 2013.

\textbf{IV. Past Player Compensation}

\textsuperscript{12} Id.
\textsuperscript{13} Id.
\textsuperscript{14} Id.
\textsuperscript{15} Id.
Throughout his first three seasons with the Rockies, Mr. Fowler earned a salary only slightly above the league minimum. He received $401,000 in 2009 and $406,000 in 2010 before earning a slight pay increase to $424,000 in 2011.\textsuperscript{16} Having accumulated enough service time to become arbitration eligible as a “Super Two” after the 2011 season, the Rockies signed Mr. Fowler to a contract for $2,350,000 for 2012.\textsuperscript{17} Mr. Fowler is now eligible for arbitration for a second year.

V. Comparative Baseball Salaries

Table 3: Comparative Hitting Statistics between Dexter Fowler and Corey Hart\textsuperscript{18}

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<tbody>
<tr>
<td>Fowler Platform</td>
<td>143</td>
<td>530</td>
<td>454</td>
<td>72</td>
<td>136</td>
<td>12</td>
<td>0.300</td>
<td>0.389</td>
<td>0.863</td>
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<td>Hart Platform</td>
<td>115</td>
<td>472</td>
<td>419</td>
<td>64</td>
<td>109</td>
<td>11</td>
<td>0.260</td>
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<td>Fowler Career</td>
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<td>2143</td>
<td>1833</td>
<td>305</td>
<td>497</td>
<td>64</td>
<td>0.271</td>
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<td>0.791</td>
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<td>Hart Career</td>
<td>521</td>
<td>2015</td>
<td>1831</td>
<td>267</td>
<td>500</td>
<td>64</td>
<td>0.273</td>
<td>0.326</td>
<td>0.795</td>
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*Hart received $4,800,000 following his 2009 platform season.

Leading up to his second year of arbitration eligibility, Corey Hart (“Mr. Hart”), a right fielder for the Milwaukee Brewers (the “Brewers”), compiled career statistics incredibly similar to Mr. Fowler. Throughout his career, Mr. Hart stole the exact same amount of bases as Mr. Fowler (64), and their batting averages and OPS were virtually identical. Mr. Fowler set himself apart from Mr. Hart, however, by playing in 27 more games for the Rockies. As a result, he was able to amass over 100 more plate appearances and contribute significantly more runs (62). Mr. Fowler has therefore made a greater impact on his team over the course of his career, serving as a dependable everyday starter and demonstrating consistency over greater amount of playing time.

\textsuperscript{17} Id.
In addition to career statistics, a player’s value to his club at the time of arbitration—and consequently, his future salary—is greatly dependent upon his performance during the critical platform season. Mr. Hart’s contributions to his team in 2009 pale in comparison to Mr. Fowler’s breakthrough 2012 season. Mr. Fowler’s superiority cannot be overstated, as he outperformed Mr. Hart in every single offensive category. He played in 28 more games, resulting in 58 more plate appearances. Mr. Fowler made the most of these plate appearances as well, accumulating 27 more hits and scoring 8 more runs than Mr. Hart during each player’s respective platform season. Furthermore, Mr. Fowler batted .300 for the season—.040 higher than Mr. Hart’s .260—and his OPS was a whopping .110 higher than Mr. Hart’s.

From even a quick glance at Table 3 above, it is undeniable that Mr. Fowler played better, more often, and more consistently than Mr. Hart during their respective platform seasons. Following Mr. Hart’s 2009 campaign, the Brewers rewarded his efforts with a contract for $4.8 million—exactly half a million dollars above the midpoint in this arbitration. With similar career statistics to Mr. Hart and an extraordinarily superior platform season, Mr. Fowler is more than justified in his request for $4.6 million as opposed to the $4 million currently being offered by the Rockies.

Table 4: Comparative Hitting Statistics between Dexter Fowler and Michael Bourn

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<tr>
<td><strong>Fowler Platform</strong></td>
<td>143</td>
<td>530</td>
<td>454</td>
<td>72</td>
<td>136</td>
<td>68</td>
<td>0.300</td>
<td>0.389</td>
<td>0.863</td>
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<tr>
<td><strong>Bourn Platform</strong></td>
<td>141</td>
<td>605</td>
<td>535</td>
<td>84</td>
<td>142</td>
<td>59</td>
<td>0.265</td>
<td>0.341</td>
<td>0.686</td>
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<tr>
<td><strong>Fowler Career</strong></td>
<td>548</td>
<td>2143</td>
<td>1833</td>
<td>305</td>
<td>497</td>
<td>260</td>
<td>0.271</td>
<td>0.364</td>
<td>0.791</td>
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<tr>
<td><strong>Bourn Career</strong></td>
<td>558</td>
<td>1941</td>
<td>1735</td>
<td>269</td>
<td>456</td>
<td>173</td>
<td>0.263</td>
<td>0.331</td>
<td>0.679</td>
</tr>
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*Bourn received $4,400,000 following his 2010 platform season.

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Michael Bourn (“Mr. Bourn”) was a center fielder for the Houston Astros (the “Astros”) during his platform year in 2010. Throughout his platform season, Mr. Bourn was able to compile a greater number of plate appearances than Mr. Fowler (605 to 530, respectively). As evidenced by his statistics, however, Mr. Fowler’s at-bats were exceedingly more productive than Mr. Bourn’s. Mr. Fowler compiled only 6 fewer hits and 8 fewer runs while stepping to the plate 75 fewer times than Mr. Bourn. He exhibited more patience and better judgment in taking his swings, leading Mr. Bourn in walks 68 to 59. Mr. Fowler’s talent for making the most of his plate appearances is even more evident when comparing averages and OPS. In the 2012 season, he hit 35 points higher than Mr. Bourn with a .180 higher OPS.

Over the course of their respective careers, Mr. Fowler has bested Mr. Bourn in every offensive category. He has surpassed him in playing time, accumulating almost 200 more plate appearances. In doing so, however, he has not lost any consistency or productivity in his hitting. He has a higher batting average (0.271 compared to 0.263), his OPS is .120 higher, and he is able to get on base more often than Mr. Bourn (0.364 to 0.331, respectively). Furthermore, following the 2010 season, which as discussed above was much less productive than Mr. Fowler’s platform season, the Astros signed a contract with Mr. Bourn for $4,400,000.20 While this contract is $200,000 less than the $4,600,000 Mr. Fowler has requested, his ability to produce offense and get on base more than justifies this figure. In addition, Mr. Bourn’s contract is still $100,000 more than the midpoint currently at discussion. Accordingly, Mr. Fowler clearly deserves the requested salary of $4,600,000 for the 2013 season.

Table 5: Comparative Hitting Statistics between Dexter Fowler and Cody Ross21

Cody Ross (“Mr. Ross”) was an outfielder for the Florida Marlins (the “Marlins”) leading into his second year of arbitration eligibility. During his platform year in 2009, Mr. Ross had more plate appearances than Mr. Fowler (604 to 530, respectively). He also hit 24 home runs compared to Mr. Fowler’s 13 homeruns. At the same time, however, Mr. Fowler was able to achieve a significantly higher OPS (.863 to .790), as well as a higher batting average (0.300 to 0.270) and on-base percentage (0.863 to 0.790). In other words, he has gotten on base more often and has hit for more total bases, even without generating flashy numbers in the homerun category. He has accounted for only one less run than Mr. Ross despite having 74 less attempts at the plate. Any advantage Mr. Ross may have in sheer power hitting was therefore overcome by Mr. Fowler’s base running and fundamental skills. This claim is further supported by Mr. Fowler’s far superior number of stolen bases (12 to 5), in spite of having been slowed down periodically by ankle injuries.

While Mr. Ross has retained his advantage in homerun hitting over the course of his career, Mr. Fowler’s has been much better at generating offense overall. He has stolen more than 4.5 times as many bases as Mr. Ross. He has amassed far more playing time (2143 to 1653 PAs), leading him to approximately 100 more hits and runs than Mr. Ross. His on base percentage is significantly greater than Mr. Ross’s (0.364 to 0.323, respectively), and he has the edge in batting average over the duration of his career thus far (0.271 compared to 0.264). After his

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<tr>
<td>Fowler Platform</td>
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<td>530</td>
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<td>12</td>
<td>0.300</td>
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<td>Ross Platform</td>
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<td>559</td>
<td>73</td>
<td>151</td>
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<td>0.270</td>
<td>0.321</td>
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<td>Ross Career</td>
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<td>0.807</td>
<td>72</td>
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*Ross received $4,450,000 following his platform 2009 season.*
second year of arbitration eligibility following the 2009 season, Mr. Ross signed a contract for $4,450,000.22 This contract is $150,000 more than the midpoint between Mr. Fowler’s request and the final offer extended by the Rockies. Mr. Fowler’s strong fundamentals and solid power hitting make him a more valuable player than Mr. Ross, and as a result he is much more deserving of the $4,600,000 he has requested than the $4,000,000 proposed by the Rockies.

VI. Existence of Physical and Mental Defects

On May 23, Mr. Fowler injured his right ankle after tripping on a defective rubber stair protector inside the visitors’ dugout in Miami.23 In early August, he also missed playing time due to back spasms following a minor injury incurred while reaching for a fly ball.24 He then re-injured his right ankle during a game in late August. Despite his ailments to his ankle and his back, Mr. Fowler was able to play through his pain and rehabilitate. He never missed more than two games in a row for these injuries.25

In late September, however, Mr. Fowler experienced pain due to tendinitis in his left wrist.26 After undergoing an MRI, it was determined that he would be unable to hit for the remainder of the season, and he was required to wear a brace for two weeks.27 He did, however, make an appearance as a defensive replacement in the Rockies’ October 1 game against the

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Mr. Fowler’s ability to field—combined with his short recovery timetable and the opportunity for rest over the offseason—indicates that his wrist injury should not hinder his performance moving forward.

Conclusion

Dexter Fowler completed a breakthrough season in 2012, providing consistency and optimism for the future of a struggling Rockies franchise. Despite sustaining several small injuries throughout the season, Mr. Fowler played through pain, healed quickly, and posted the best offensive numbers of his career. Comparing Mr. Fowler to similar players clearly shows he is deserving of a salary in excess of the $4.3 million midpoint in contention in this proceeding. Mr. Fowler achieved a platform season enormously better than that of Corey Hart, who received a contract for $4.8 million—$200,000 more than Mr. Fowler is even requesting. Michael Bourn, who received a salary above our midpoint of $4.4 million, generated more playing time than Mr. Fowler in his platform year. However, Mr. Fowler has proven to be a much more effective hitter, generating more offensive production despite having fewer at-bats. Finally, Dexter Fowler’s hitting has been more impressive than Cody Ross, who received $150,000 above the midpoint in this arbitration, or $4.44 million. Despite having fewer home runs than Mr. Ross, Mr. Fowler still outperformed him in OPS during the platform year and virtually every offensive career statistic. For these reasons we ask the arbitration panel to find in favor of Dexter Fowler and award him a salary of $4.6 million.

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28 Id.