2013 NATIONAL BASEBALL ARBITRATION COMPETITION

DEXTER FOWLER v. COLORADO ROCKIES
SUBMITTED FOR REVIEW ON BEHALF OF THE COLORADO ROCKIES
MIDPOINT SALARY: $4.30 MILLION

SUBMISSION BY: TEAM 17
TABLE OF CONTENTS

I. INTRODUCTION AND REQUEST FOR HEARING DECISION..................................................3
II. QUALITY OF MR. FOWLER’S CONTRIBUTIONS DURING THE MOST RECENT SEASON........4
III. LENGTH AND CONSISTENCY OF MR. FOWLER’S CAREER CONTRIBUTIONS..................5
IV. MR. FOWLER’S PAST COMPENSATION........................................................................7
V. ANALYSIS OF COMPARABLE SALARIES FOR PLAYERS SIMILAR TO MR. FOWLER........7
VI. EXISTENCE OF PHYSICAL OR MENTAL DEFECTS........................................................11
VII. RECENT PERFORMANCE OF THE COLORADO ROCKIES............................................12
VIII. SUMMARY AND CONCLUSION......................................................................................12

TABLE OF AUTHORITIES


I. INTRODUCTION AND REQUEST FOR HEARING DECISION

This brief analyzes the contributions and abilities of center fielder William Dexter Fowler (the “Player” or “Fowler”) for an arbitration hearing to determine his total compensation in a one-year contract with the Colorado Rockies (the “Club” or the “Rockies”) for the 2013 season. The Major League Baseball (“MLB”) Collective Bargaining Agreement (“CBA”) governs this arbitration hearing. According to CBA Article VI (E), Part 10(a)—(b), the relevant criteria for determining a salary value during arbitration include: (1) the quality of the Player’s contribution to his Club during the past season (including but not limited to his overall performance, special qualities of leadership and public appeal); (2) the length and consistency of his career contribution; (3) the record of the Player’s past compensation; (4) comparable baseball salaries; (5) the existence of any physical or mental defects on the part of the player; and (6) the recent performance record of the club, including but not limited to its League standing and attendance as an indication of public acceptance.\(^1\) For players with fewer than five years of relevant MLB service, such as Mr. Fowler, the panel shall “give particular attention, for comparable salary purposes, to the contracts of Players with Major League service not exceeding one annual service group above the Player’s annual service group.”\(^2\)

Mr. Fowler has accumulated 3.168 years of MLB service, which entitles him to arbitration.\(^3\) He has proved himself a valuable member of the Rockies franchise, and has shown flashes of remarkable talent. However, Mr. Fowler’s inconsistent batting performance, particularly away from his home stadium, the hitter-friendly Coors Field, along with his poor

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\(^1\) Major League Baseball Collective Bargaining Agreement, “2012-2016 Basic Agreement,” Article VI(E), § 10(a), pp. 20-21, available at http://mlbplayers.mlb.com/pa/pdf/cba_english.pdf. Inadmissible evidence includes, but is not limited to, “press comments or similar materials bearing on the performance of either the Player or the Club,” excepting annual Player awards for playing excellence. \(Id.\)

\(^2\) \(Id.\)

\(^3\) \(Id.\) at Article VI(E), § 1(a), pp. 17-18.
defensive performance since joining the team in 2008, establish that he is fairly entitled to a salary below the $4.3 million midpoint between his offer and the offer proposed by the Club. The Rockies request this panel find Mr. Fowler entitled to a 2013 salary award of $4.0 million.

II. QUALITY OF MR. FOWLER’S CONTRIBUTIONS DURING THE MOST RECENT SEASON

During the past season, Mr. Fowler put up the strongest offensive numbers thus far in his career. His batting average improved to .300, with a .389 on-base percentage and a .474 slugging percentage, all career-high figures. Though he hit more home runs (13) than in his previous three seasons with the Club, his total runs (72), doubles (18), and stolen bases (12), were all career lows, despite playing in more games than any season previous. Fowler further proved prone to strikeouts, failing to put the ball in play in over 24 percent of his at-bats. He did, however, continue to draw walks at a solid rate, nearly 13 percent of all plate appearances, contributing to his career-high on-base percentage but a relatively mediocre .54 walk-to-strikeout ratio. Fowler appeared in 143 games, but he missed several weeks with a left wrist injury, his second injury in three years causing him to miss more than ten games.

Despite his improvements at the plate, Mr. Fowler continued to be troublingly error-prone in the field. Starting only 116 games in center field, Fowler led all National League center fielders in errors committed, 6, and tied his career-low fielding percentage (.975). In games played in American League ballparks, Mr. Fowler was slotted into the line-up as a designated hitter rather than in centerfield, a testament to his consistent fielding troubles.

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6 Id.
8 Several advanced metrics of fielding performance have also ranked Fowler as among the worst fielders in all of baseball, not just in his position. See Robbie Knopf, Could the Rays Acquire Dexter Fowler (Oct. 7, 2012), Rays.
III. LENGTH AND CONSISTENCY OF MR. FOWLER’S CAREER CONTRIBUTIONS

Mr. Fowler has been a part of the Colorado Rockies franchise since the Club drafted him in the 14th round of the 2004 Major League Baseball Draft. He played for four full years with various minor league affiliates of the Club, including an impressive 2008 season with the Double-A Tulsa Drillers of the Texas League, which resulted in Fowler being briefly called up to the majors for thirteen games late in the 2008 season. He began the 2009 season as a member of the Rockies 25-man roster, and played in 135 games for the Club, hitting .266 with 29 doubles and 27 stolen bases. Mr. Fowler’s speed and base running abilities were considered particularly well developed, and he set a modern record for rookies by stealing five bases in a single game against the San Diego Padres in April 2009. Fowler’s impressive rookie campaign resulted in him finishing eighth in voting for National League Rookie of the Year in 2009.

Dexter Fowler 2010-12 Offensive Statistics

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<th>2B</th>
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<td>45</td>
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<td>130</td>
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<td>2012</td>
<td>143</td>
<td>454</td>
<td>136</td>
<td>18</td>
<td>11</td>
<td>13</td>
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<td>128</td>
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<td>0.389</td>
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</table>

The 2010 and 2011 seasons saw Fowler, a switch-hitter, sustain his batting performance at the plate – maintaining a relatively stable batting average (.260 and .266, respectively) and on-base percentage (.347 and .363, respectively). Though Fowler led the National League in triples in 2010, with 14, and hit for 35 doubles in 2011, the rest of his batting statistics are

Colored Glasses, http://rayscoloredglasses.com/2012/10/07/could-the-rays-acquire-dexter-fowler/ (“Another issue with Fowler is his defense. Fowler has been considered a significantly below-average defender by both UZR [‘Ultimate Zone Rating’] and FRAA [‘Fielding Runs Above Average’]. UZR thinks he’s among the worst in baseball at a ridiculous -39.1 mark the past five years (39.1 runs below average), while FRAA considers him simply bad at -5.6.”) (emphasis added).

10 Fowler Ties Modern Day Record with 5 SBs; Hawpe Taken to Hospital, ESPN (Apr. 27, 2009), http://scores.espn.go.com/mlb/recap?gameId=290427127.
11 Dexter Fowler Career Statistics, MLB, http://mlb.mlb.com/team/player.jsp?player_id=451594#gameType=R&sectionType=career&statType=1&season=2012&level='ALL'.
altogether unremarkable. In 2010 and 2011, Fowler had only one positive offensive statistical category in which he finished in the National League top ten: triples (twice, first in 2010 and third in 2011). In 2011, he also finished in tenth in the National League in times caught stealing, despite falling off from a high of 27 stolen bases during his rookie year to only 13 and 12 stolen bases in 2010 and 2011.

Fowler’s offensive performance in 2012 was an improvement over his performance in 2010 and 2011. Much of this improvement, however, came from his offensive output at his home stadium, Coors Field, which is particularly hitter-friendly. Fowler hit seventy points better when playing at Coors Field, a .332 average at home compared to a .262 average in away games. He also hit 77 percent of his home runs at home, scored 70 percent of his runs at home, and batted-in 73 percent of his RBIs at home. This discrepancy is far higher than that seen in other league players, and indicates that Fowler’s offensive statistics are inflated compared to other players throughout the league who do not play 81 games a year at an elevation of 5,280 feet.

| Dexter Fowler 2012 Home vs. Away Batting Statistics |
|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
|          | G        | AB       | H        | 1B       | 2B       | 3B       | HR       | R        | RBI      | SO       | AVG.     |
| **Home** | 70       | 244      | 81       | 54       | 10       | 7        | 10       | 51       | 39       | 61       | 0.332    |
| **Away** | 65       | 210      | 55       | 40       | 8        | 4        | 3        | 21       | 14       | 67       | 0.262    |

13 Id.
14 Id.
15 Advanced metrics rank Coors field as the most hitter-friendly park in baseball in 2012, with nearly .3 runs per game more than the next friendliest park, U.S. Cellular Field in Chicago, and nearly 1 run per game more than the least hitter-friendly park, Safeco Field in Seattle. MLB ParkFactors 2012, available at http://espn.go.com/mlb/stats/parkfactor.
16 Dexter Fowler Splits: Regular Season 2012, MLB, http://mlb.mlb.com/team/player.jsp?player_id=451594#gameType='R'&sectionType=splitsCareer&statType=1&season=2012&level='ALL'.
17 Id.
18 For example, Cody Ross, see Part V(b) infra, hit 59 percent of his home runs, scored 60 percent of his runs, and batted-in 62 percent of his RBIs at home. See Cody Ross, FanGraphs, http://www.fangraphs.com/statsplits.aspx?playerid=1760&position=OF&season=2012.
19 Dexter Fowler Splits: Regular Season 2012, MLB, http://mlb.mlb.com/team/player.jsp?player_id=451594#gameType='R'&sectionType=splitsCareer&statType=1&season=2012&level='ALL'.
}

\section*{IV. Mr. Fowler’s Past Compensation}

During 2010 and 2011, Mr. Fowler made slightly more than the league minimum salary: earning $406,000 for the 2010 season and $424,000 in the 2011 season.\footnote{Dexter Fowler, \textit{Baseball Player Salaries}, http://baseballplayersalaries.com/players/782_Dexter_Fowler.} Eligible for arbitration as a Super Two after the 2011 season, Fowler and the Rockies reached agreement on a one-year contract worth $2.35 million for the 2012 season.\footnote{\textit{Id.}}

\section*{V. Analysis of Comparable Salaries for Players Similar to Mr. Fowler}

Dexter Fowler’s performance in his first few years in the league: a relatively outstanding rookie season followed by several years of consistent, but lower, performance at the plate, and then a markedly better season the year entering arbitration, is not without compare. Though a dearth of center fielders have gone through salary arbitration since 2007, Fowler’s career trajectory allows for a robust comparison with two players who have gone through salary arbitration—Cody Ross of the Miami Marlins and B.J. Upton of the Tampa Bay Rays—and one player who signed a contract outside of arbitration, Adam Jones of the Baltimore Orioles.

\footnote{Id.}
A. Cody Ross

Ross entered salary arbitration after the 2009 season as a 28-year-old center fielder with the Miami (then Florida) Marlins. Like Fowler, Ross had been an active member of his franchise for just over three seasons upon entering arbitration. His 2009 salary, $2.25 million, comes in only $100,000 below Fowler’s 2012 platform salary. Ross sought, and was awarded, $4.45 million, just above the midpoint offer at issue in this arbitration.

Ross’ statistics in the three years prior to arbitration show him to be a more developed and consistent offensive player and a far more outstanding defensive player than Fowler. Though Fowler’s batting average and base running outpaced Ross (.300 for Fowler, .270 for Ross; 12 stolen bases for Fowler, 5 for Ross), Ross outperformed Fowler in several categories. He more than doubled Fowler’s doubles (37 to 18), hit nearly twice as many home runs (24 to 13), batted in 37 more runs (90 to 53), and had a superior slugging percentage (.481 to .474). By offensive performance alone, Ross proved himself more than $150,000 more valuable than Mr. Fowler.

However, it is in comparing Ross and Fowler on defense that Ross shows himself remarkably more valuable than Fowler. Competing at the same position, Ross has proven himself to be consistently one of the National League’s premier defensive outfielders. In 2008, the year before his platform season, he led the league in fielding percentage and committed no errors as a center fielder, while finishing in the top five in league rankings in assists, range factor per game, and fewest total zone runs. The next season, he finished in the top five in the league

27 Id.
28 Id.
in put-outs as an outfielder, and while playing 149 games committed only three total errors.29 Entering arbitration, Ross was a more versatile and durable defensive player than Fowler, who remains an error-prone, marginal defensive player.

Ross’ arbitration-awarded salary of $4.45 million, after his performance from 2006-2009, shows him as at least $150,000 more valuable than Fowler.

B. B.J. Upton

Like Ross, B.J. Upton entered salary arbitration after the 2009 season. He had accumulated slightly more than three seasons of eligible service, and shows a number of similarities to Dexter Fowler’s style of play: an emphasis on base running, the ability to draw walks, and a weakness for strikeouts. Upton entered arbitration having been paid near the league minimum in 2008 and 2009, and was ultimately awarded a $3 million contract.30 Though he does not prove an ideal comparison, due to his slightly lower contract value and the fact he plays positions other than center field, his offensive statistics provide a useful comparison to show why Mr. Fowler should not be awarded a figure of more than 150 percent of Upton’s award.

Upton had an undoubtedly weaker platform season than Fowler in several respects: his batting average and on-base percentages were substantially lower (.241/.313 for Upton, .300/.389 for Fowler), he also struck out in around a quarter of his at-bats, and he hit fewer triples (4) and home runs (11).31 However, Upton outperformed Fowler in areas considered to be Fowler’s strengths: Upton stole 42 bases, well over three times as many as Fowler, hit nearly twice as many doubles (33 to 18), and drew just eleven fewer walks.32 Further, Upton’s platform season

29 Id.
32 Id.
batting average and on-base percentage statistics were outliers – aggregating his two prior seasons shows a .287 hitter that reached base at a .385 clip – just as Fowler’s platform season is, albeit an improvement rather than a regression.

Finally, Upton was a far more consistent defensive player than Fowler. Though slightly error-prone, with 4 in his platform season and 7 the season prior,33 his arm was substantially stronger than Fowler’s, finishing in the top five centerfielders in the American League in putouts, assists, and range factor per game in both 2008 and 2009.34 Simply put, the cumulative data points of Upton’s three seasons show him to be only a slightly worse hitter than Fowler in terms of average and on-base percentage, while equaling or surpassing Fowler in a number of other offensive categories and proving himself to be a far superior defensive center fielder.

C. Adam Jones

The Baltimore Orioles and center fielder Adam Jones avoided arbitration following the 2011 season, agreeing to a one-year contract worth $6.15 million.35 Jones’ consistent batting performance and outstanding defensive play – despite being as error-prone as Mr. Fowler – establish his value as markedly higher than Mr. Fowler.

At the plate, Jones surpassed or equaled many of Fowler’s batting statistics. Despite a slightly lower batting average and slugging percentage in his pre-contract season (.280 and .466, versus .300 and .474), Jones outpaced Fowler in power categories, nearly doubling Fowler’s home runs (25 to 13), hitting 150% the RBIs (83 to 53), and more doubles (26 to 18), while

34 Id.
stating the same number of bases (12). Jones’ batting statistics were remarkably consistent from 2009 through 2011, and his 2009 campaign saw him named to the AL All-Star team.

Jones coupled this high-level offensive performance with outstanding defensive play. Though, like Fowler, he led his League in errors by a center fielder in his platform season (while playing in 30 more defensive games), he coupled those mistakes with otherwise remarkable and versatile fielding, leading the league in assists by a center fielder in 2010 and 2011, and range factor per game in 2010. Moreover, his excellent fielding in 2009 resulted in him being awarded a Gold Glove Award.

Jones’ durability and well roundedness in center field, coupled with batting statistics the compare favorably to Fowler’s performance from 2010 to 2012, demonstrate his greater value.

VI. **Existence of Physical or Mental Defects**

Though Mr. Fowler has avoided severe injury throughout his young career, he has missed time in each of his three major league seasons for injury problems – in 2011 he was placed on the disabled list and sent to the minors for rehabilitation, and in 2012 he twice missed games for injury, first for damage to his ankle, and second for an injury to his left wrist. This consistent pattern of injuries, and their effects on some of his most beneficial offensive attributes, calls into question his ability to be an everyday starter in a position, center field, which is quite physically demanding.

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37 *Id.*
38 *Id.*
39 *Id.*
40 *Id.*
43 Aaron Gleeman, *Dexter Fowler Unlikely to Play Again this Season Due to Wrist Injury*, [Hardball Talk](http://hardballtalk.nbcspores.com/2012/09/27/dexter-fowler-unlikely-to-play-again-this-season-due-to-wrist-injury/).
VII. RECENT PERFORMANCE OF THE COLORADO ROCKIES

After the Club’s first World Series trip in 2007, the Rockies again made the playoffs as a wild card in 2009, winning 92 regular season games before losing in the NLDS to the Philadelphia Phillies. In the three campaigns since that 2009 season, however, the Rockies have underperformed, culminating in a 98-loss 2012 season that found the Rockies in the basement of the NL West, and saw fan attendance drop by over 3,000 per game. This marked a second-straight losing season for the Rockies, and was the Rockies’ single-worst record since joining the major leagues as an expansion franchise in the 1993 season. Though the NL West remains a difficult division, the Rockies’ managed winning records against only four National League teams, and were a dismal 27-43 against division foes, and a league-worst 2-13 against American League opponents. Much of this lackluster performance can be attributed to the team’s poor defense – one of the worst in baseball over the past several seasons by almost every statistical metric.

VIII. SUMMARY AND CONCLUSION

The Rockies are firm in their belief that Mr. Fowler can be a building block for the longstanding future success of the franchise. However, his inconsistent offensive performance coupled with his lackluster defensive statistics give the Club pause. Comparing Fowler with other similar players, in and out of arbitration, show his value to be far closer to the Club’s offer of $4 million than Fowler’s offer of $4.6 million, and we respectfully request a finding that Mr. Fowler is entitled to a $4 million contract in the 2013 season.

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47 See, e.g., Andrew Martin, 2012 Rockies Defense Hasn’t Helped Anything, The Purple Row (Oct. 12, 2012), http://www.purplerow.com/2012/10/19/3524906/friday-rockpile-2012-rockies-defense-hasnt-helped-anything (noting the Rockies’ fielding percentage was one of the worst in team history, and that their fielding cost the team nearly 100 runs in the field per the Defensive Runs Saved metric).