2013 Tulane National Baseball Arbitration Competition

Dexter Fowler v. Colorado Rockies
Submission on Behalf of the Colorado Rockies
Midpoint: $4.3 million
Submission by: Team 22
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Major League Baseball Collective Bargaining Agreement, “2007-2011 Basic Agreement”, Article VI

Major League Baseball Collective Bargaining Agreement, “2012-2016 Basic Agreement”, Article VI

I. Introduction and Request for Hearing Decision

On behalf of the Colorado Rockies (“Rockies” or “Club”), this brief will highlight the qualities and contributions of right-handed, switch-hitting centerfielder Dexter Fowler (“Mr. Fowler”) to be reflected in his 2013 salary with the Club. The Major League Baseball (“MLB”) Collective Bargaining Agreement (“CBA”) between the MLB Player’s Association and all MLB Clubs provides the guidelines for this arbitration proceeding. Article VI, Section E, Part 10 of the CBA enumerates the criteria allowed for consideration during arbitration, which includes:

1. the quality of the Player’s contribution to his Club during the past season;
2. the length and consistency of his career contributions;
3. the record of the Player’s past compensation;
4. comparative 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.

Further, when considering comparative salaries, the CBA directs the panel to pay particular attention to the contracts of Players with Major League service time not exceeding one annual service group above the Player’s annual service group. Additionally, the following items shall be deemed inadmissible:

1. the financial position of the Player and the Club;
2. press comments, testimonials or similar material bearing on the performance of either the Player or the Club, except that recognized annual Player awards for playing excellence shall not be excluded;
3. offers made by either the Player or the Club prior to arbitration;
4. the cost to the parties of their representatives, attorneys, etc.; and
5. salaries in other sports or occupations.

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2 Id.
3 Id.
4 Id.
Mr. Fowler, after obtaining eligibility for arbitration in 2012 as a “Super Two,” has now amassed the necessary three years of Major League Service Time (“MLST”) enabling him to proceed to this arbitration. While the Rockies value Mr. Fowler as a core member of the lineup, his offer is unreasonably high. Despite a notable increase in offensive productivity in 2012, Mr. Fowler has had some durability issues of late and is amongst the least effective defensive center fielders in MLB. Through this brief and oral argument, the Club will show that Mr. Fowler’s performance rightfully warrants their offered salary of $4 million, but more importantly, a salary below the $4.3 million midpoint between the parties’ respective offers. Therefore, the Colorado Rockies respectfully request this arbitration panel award Mr. Fowler a 2013 salary of $4 million.

II. Quality of the Dexter Fowler’s Contributions During the Past Season

In 2012, Mr. Fowler’s fifth year as member of the Rockies organization, he continued to serve as their primary center fielder and leadoff hitter. Mr. Fowler played 131 games in center field with 530 Plate Appearances. Defensively, Mr. Fowler’s performance was substandard, as he led all National League (“NL”) center fielders in errors committed. Mr. Fowler’s batting improved dramatically, however, as he produced a Batting Average of .300, an On-Base Percentage of .389, a Slugging Percentage of .474 and an On-base Plus Slugging Percentage of .863.

Batting Average (“BA”) equals the number of Hits a player gets per At Bat (“AB”), whereas On Base Percentage (“OBP”) equals the total number of times a player gets on base relative to his total Plate Appearances (“PA”).

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6 Id.
7 Id.
8 Id.
comes to the plate as a hitter, while ABs exclude PAs resulting Walks, Hit By Pitch, Sacrifices and Catcher Interference. \(^{10}\) Slugging Percentage (“SLG”) provides the rate of total bases a player receives per AB, the value ranging from 1 for a single to 4 for a HR. \(^{11}\) “On [Base] Plus Slugging” Percentage or “OPS”, a self-explanatory formula is now used more frequently as an improved method of evaluating overall offensive “production”, because it accounts for varying hitting styles (e.g. power versus average). \(^{12}\) “Fielding Percentage” (“Fld%”) represents the average of errors per total chances. \(^{13}\)

| Table 1: Dexter Fowler’s Platform Year (Age 26)\(^{14}\) |
|-----------------|---|---|---|---|---|---|---|---|
| 2012            | 530 | 72 | 0.300 | 0.389 | 0.474 | 0.863 | 131 | 0.978 |

| Table 2: Dexter Fowler’s Platform Year (Home vs. Away)\(^{15}\) |
|-----------------|---|---|---|---|---|---|---|
| Home            | 293 | 51 | 81 | 10 | 39 | 0.332 | 0.431 | 0.553 |
| Away            | 237 | 21 | 55 | 3  | 14 | 0.262 | 0.339 | 0.381 |

One troubling aspect of Mr. Fowler’s platform production was his inability to maintain his increased productivity when playing away from Coors Field, the Rockies’ home stadium, and the most hitter-friendly park in MLB. \(^{16}\) The decline in productivity in away games holds true in each of the following statistical categories: BA (.332 vs. .262), OBP (.431 vs. .339), SLG (.548 vs. .382), and OPS (.937 vs. .772). \(^{17}\) While Mr. Fowler hit a career-high 13 Home Runs (“HR”) in 2012, his performance yielded fewer extra base hits (42). \(^{18}\) In light of Mr. Fowler’s inability to produce on the road, the impact of his overall offensive production is lessened. Mr. Fowler’s

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\(^{10}\) [Id.]
\(^{11}\) [Id.]
\(^{14}\) [Id.]
\(^{15}\) [Id.]
poor defensive performance further reduces his value, making the Rockies’ offer of $4 million all the more reasonable.

III. Length and Consistency of Career Contributions

Until the recent spike in batting performance, Mr. Fowler was consistently average as a hitter, which may indicate that his 2012 statistics are more an anomaly than a new norm. In 2004, Mr. Fowler was drafted by the Colorado Rockies in the 14th round of the amateur draft and has been used consistently in the Rockies’ lineup since he made his Major League debut for the Club in 2008.19

In 2009, Mr. Fowler’s first full season with the Rockies, he became the Club’s primary center fielder, playing defensively in 127 games with a total of 519 PAs.20 In those appearances, Mr. Fowler produced 73 runs on 115 hits, including 4 home runs, and compiled a .266 BA, .363 OBP, .406 SLG, and .770 OPS.21 Mr. Fowler’s performance in 2010 produced nearly identical results. Playing 120 games in center field, with 505 PAs, Mr. Fowler generated 73 runs on 114 hits.22 His batting resulted in a .260 BA, .347 OBP, .410 SLG, and .757 OPS.23 True to form, Mr. Fowler’s 2011 performance provided much of the same as the previous two seasons. Though he compiled career-highs in PAs (563) and Runs (83), Mr. Fowler still played only 122 games in center field.24 With 128 hits and 5 HRs contributing to the overall production, Mr. Fowler generated a .266 BA, .363 OBP, .432 SLG, and .796 OPS.25 With a few exceptions and minor improvements (see Table 3), Mr. Fowler provided clockwork-like consistency in both utility and production from 2009-2011. When considered alongside the previous three seasons, Mr.

19 Id. at http://www.baseball-reference.com/players/f/fowlede01.shtml
20 Id.
21 Id.
22 Id.
23 Id.
24 Id.
25 Id.
Fowler’s increased offensive productivity of 2012 appears more like an aberration, rather than an indicator of what can be expected from Mr. Fowler in the future.

Table 3: Dexter Fowler’s Career Statistics

<table>
<thead>
<tr>
<th>Year</th>
<th>PA</th>
<th>R</th>
<th>BA</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
<th>GP</th>
<th>Fld%</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008</td>
<td>27</td>
<td>3</td>
<td>0.154</td>
<td>0.185</td>
<td>0.154</td>
<td>0.339</td>
<td>10</td>
<td>1.000</td>
</tr>
<tr>
<td>2009</td>
<td>518</td>
<td>73</td>
<td>0.266</td>
<td>0.363</td>
<td>0.406</td>
<td>0.770</td>
<td>127</td>
<td>0.984</td>
</tr>
<tr>
<td>2010</td>
<td>505</td>
<td>73</td>
<td>0.260</td>
<td>0.347</td>
<td>0.410</td>
<td>0.757</td>
<td>120</td>
<td>0.996</td>
</tr>
<tr>
<td>2011</td>
<td>563</td>
<td>84</td>
<td>0.266</td>
<td>0.363</td>
<td>0.432</td>
<td>0.796</td>
<td>122</td>
<td>0.975</td>
</tr>
<tr>
<td>2012</td>
<td>530</td>
<td>72</td>
<td>0.300</td>
<td>0.389</td>
<td>0.474</td>
<td>0.863</td>
<td>131</td>
<td>0.978</td>
</tr>
<tr>
<td>CAREER</td>
<td>2143</td>
<td>305</td>
<td>0.271</td>
<td>0.364</td>
<td>0.427</td>
<td>0.791</td>
<td>509</td>
<td>0.983</td>
</tr>
</tbody>
</table>

Overall, Mr. Fowler’s career batting statistics are deceptive, inflated by his 2012 season and playing around half his games at Coors Field. While the Club benefits from Mr. Fowler’s heightened performance at home, they also suffer the consequences of his failure to perform at the same level on the road. Mr. Fowler’s career numbers, even with the recent spike in performance, leave the Club confident that a 2013 salary of $4 million is reasonable.

Table 4: Dexter Fowler’s Career (Home vs. Away)

<table>
<thead>
<tr>
<th>Year</th>
<th>PA</th>
<th>R</th>
<th>H</th>
<th>HR</th>
<th>RBI</th>
<th>BA</th>
<th>OBP</th>
<th>SLG</th>
</tr>
</thead>
<tbody>
<tr>
<td>Home</td>
<td>1103</td>
<td>182</td>
<td>271</td>
<td>20</td>
<td>120</td>
<td>0.295</td>
<td>0.395</td>
<td>0.487</td>
</tr>
<tr>
<td>Away</td>
<td>1040</td>
<td>123</td>
<td>226</td>
<td>8</td>
<td>48</td>
<td>0.248</td>
<td>0.331</td>
<td>0.367</td>
</tr>
</tbody>
</table>

IV. Past Compensation

Mr. Fowler was compensated near league minimum by the Rockies until his Super Two year. Avoiding arbitration, the Club and Mr. Fowler agreed that a 2012 salary of $2.35 million was fair. Mr. Fowler now seeks and deserves a raise. However, Mr. Fowler’s $4.6 million offer would almost double his 2012 salary, while the club’s $4 million offer constitutes a more

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26 Id.
27 Games played defensively at CF
28 Id. at http://www.baseball-reference.com/players/split.cgi?id=fowlede01&year=Career&t=b
reasonable 170% raise. In light of Mr. Fowler’s previous compensation and contributions to the Rockies, the Club believes that a raise to $4 million for 2013 is both fair and reasonable.

V. Comparative Baseball Salaries

The Rockies have found a number of statistically comparable players whose compensation figures, following their second year of arbitration eligibility, support the position that Mr. Fowler deserves a salary below the midpoint of $4.3 million.

The first comparable player is Michael Bourn, a pure center fielder and leadoff hitter who received a one-year, $4.4 million contract in his second year of arbitration eligibility.\(^{30}\) Bourn’s $4.4 million salary in 2011 sits just above the midpoint here, but so too did his second platform season salary when compared to Fowler’s for 2012. Applying the same 183% increase that Bourn received to Mr. Fowler 2012 salary produces the precise midpoint in the present case, $4.3 million. However, Bourn’s value exceeds Mr. Fowler’s in significant ways, thus making the Club’s $4 million offer more appropriate.

In 2010, his second platform season, Bourn played in more games, creating 75 more PAs.\(^{31}\) As a defensive center fielder, Bourn’s value far exceeds Mr. Fowler’s. In 2010, Bourn posted a .992 Fld%, helping earn him a second consecutive Gold Glove and a place on the NL All-Star Team.\(^{32}\) By contrast, Mr. Fowler’s platform season saw him commit the most errors of any NL center fielder, contributing to his .978 Fld%, a category in which he holds a career rank of 24\(^{th}\) out of the 25 active, qualifying center fielders.\(^{33}\)

While Mr. Fowler’s anomalous 2012 batting production bested Bourn’s in BA and HRs, Bourn’s ability to create scoring opportunities with his legs bolsters is offensive value. In 2010,


\(^{32}\) Id.

Bourn stole 52 bases, making him the best in the NL for a second consecutive season.\textsuperscript{34} Mr. Fowler, however, stole a subpar 12 bases last year, which tied him for 15\textsuperscript{th} among the 17 qualifying center fielders in 2012.\textsuperscript{35} Despite Mr. Fowler’s higher hitting numbers, Bourn’s superior base-stealing skills put him in scoring position more frequently, demonstrated by his 84 runs in 2010 to Mr. Fowler’s 72 in 2012.\textsuperscript{36} Finally, Bourn’s productivity does not suffer in away games, as he posted a higher OBP, scored only 2 fewer Runs, and his BA dropped by a mere .003.\textsuperscript{37}

Mr. Fowler’s improved batting statistics in 2012 were better than Bourn’s platform numbers in several areas, but largely because of the inflated production at Coors Field. Furthermore, base-stealing proficiency and run production reduces the disparity significantly. Finally, Bourn’s Gold Glove-earning, All-Star worthy defensive play, adds a dimension to his value that Mr. Fowler does not possess. For these reasons, the Club believes that their $4 million offer is more than reasonable.

The next player the Club believes to be comparable is Angel Pagan. Pagan received a one-year, $3.5 million contract in 2011.\textsuperscript{38} Like Mr. Fowler, Pagan is a switch-hitting center fielder.\textsuperscript{39} In 2010, his second platform season, Pagan had over 100 more PAs that produced more Runs, Hits, and Runs Batted In (“RBI”), and nearly as many HRs (11 versus 13).\textsuperscript{40} Pagan, like Bourn, is a serious threat to steal bases with 37 in his second platform season to Mr. Fowler’s 12.\textsuperscript{41} Mr. Fowler does have a slightly higher BA (.300 vs. .290), OBP (.389 vs. .340), SLG (.474 vs. .452).

\begin{thebibliography}{9}
\bibitem{34} Bourn, Baseball Reference. \url{http://www.baseball-reference.com/players/b/bournmi01.shtml}
\bibitem{35} ESPN. \url{http://espn.go.com/mlb/stats/batting/_/position/cf/sort/stolenBases/qualified/true}
\bibitem{36} Bourn, Baseball Reference. \url{http://www.baseball-reference.com/players/b/bournmi01.shtml}
\bibitem{37} Id.
\bibitem{38} Id.
\bibitem{39} Angel Pagan, Baseball Prospectus. \url{http://www.baseballprospectus.com/card/card.php?id=PAGAN19810702A}
\bibitem{40} Angel Pagan Statistics and History, Baseball Reference. \url{http://www.baseball-reference.com/players/p/paganan01.shtml}
\bibitem{41} Id.
\end{thebibliography}
vs. 425) and OPS (.863 vs. .765) than Pagan.\textsuperscript{42} However, like most NL center fielders, Pagan is stronger defensively with a Fld\% of .987 compared to Mr. Fowler’s .978.\textsuperscript{43}

Mr. Fowler’s slightly higher statistics are represented through the higher offer given by the Club. However, when compared to Pagan’s offensive productivity and superior defensive abilities, Mr. Fowler’s $4.6 million offer appears unreasonable.

The final player the Club believes to be comparable is Melky Cabrera. Cabrera received a 2010 salary of $3.1 million, representing a 221\% raise.\textsuperscript{44} Cabrera and Mr. Fowler have substantial similarities between their two platform seasons, improving BA, OBP, SLG and OPS significantly.\textsuperscript{45} Cabrera and Mr. Fowler produced the same number of HRs (13), while Mr. Fowler scored only 6 more runs.\textsuperscript{46} Cabrera produced 15 more RBIs than Mr. Fowler, and again was far superior defensively.\textsuperscript{47} In Cabrera’s platform season, he led the American League with a perfect 1.000 Fld\% at center field.\textsuperscript{48} Cabrera and Mr. Fowler’s base running capabilities are also similar, with Mr. Fowler stealing just 2 more bases in his platform season.\textsuperscript{49}

\begin{flushleft}
\textsuperscript{42} Id.
\textsuperscript{43} Id.
\textsuperscript{44} Melky Cabrera, Baseball Prospectus, \url{http://www.baseballprospectus.com/card/card.php?id=45397}
\textsuperscript{45} Melky Cabrera Statistics and History, Baseball Reference, \url{http://www.baseball-reference.com/players/c/cabreme01.shtml}
\textsuperscript{46} Id.
\textsuperscript{47} Id.
\textsuperscript{48} Id.
\textsuperscript{49} Id.
\end{flushleft}
## Table: 5 Comparable Center Fielders

<table>
<thead>
<tr>
<th>Player</th>
<th>Offers: $4.6M – [$4.3M] - $4.0M (Club)</th>
<th>PA</th>
<th>R</th>
<th>BA</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
<th>GP</th>
<th>Fld%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dexter Fowler (CF)²⁰</td>
<td></td>
<td>2012</td>
<td>530</td>
<td>72</td>
<td>0.300</td>
<td>0.389</td>
<td>0.474</td>
<td>0.863</td>
<td>131</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Career</td>
<td>2143</td>
<td>305</td>
<td>0.271</td>
<td>0.364</td>
<td>0.427</td>
<td>0.791</td>
<td>509</td>
</tr>
<tr>
<td>Michael Bourn (CF)²¹</td>
<td>Awarded 2011 Salary: $4,400,000</td>
<td>2010</td>
<td>605</td>
<td>84</td>
<td>0.265</td>
<td>0.341</td>
<td>0.346</td>
<td>0.686</td>
<td>138</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Career</td>
<td>1941</td>
<td>269</td>
<td>0.263</td>
<td>0.331</td>
<td>0.348</td>
<td>0.679</td>
<td>527</td>
</tr>
<tr>
<td>Angel Pagan (CF)²²</td>
<td>Awarded 2011 Salary: $3,500,000</td>
<td>2010</td>
<td>633</td>
<td>80</td>
<td>0.290</td>
<td>0.340</td>
<td>0.425</td>
<td>0.765</td>
<td>145</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Career</td>
<td>1462</td>
<td>195</td>
<td>0.285</td>
<td>0.335</td>
<td>0.435</td>
<td>0.770</td>
<td>371</td>
</tr>
<tr>
<td>Melky Cabrera (CF)²³</td>
<td>Awarded 2010 Salary: $3,100,000</td>
<td>2010</td>
<td>540</td>
<td>66</td>
<td>0.274</td>
<td>0.336</td>
<td>0.416</td>
<td>0.752</td>
<td>151</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Career</td>
<td>2148</td>
<td>250</td>
<td>0.269</td>
<td>0.331</td>
<td>0.385</td>
<td>0.716</td>
<td>559</td>
</tr>
</tbody>
</table>

Based on these comparisons, the Club believes Mr. Fowler’s salary is rightly placed at $4 million. Mr. Fowler does not have the defensive prowess or base-running ability of these players, and again has the Coors Field hitting advantage to inflate his statistics.

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

Thus far in his career, Mr. Fowler has been able to avoid serious injuries. Though placed on the 15-day DL in 2011 with an abdominal strain, he was able to recover and return without issue.⁵⁴ The rate of Mr. Fowler’s minor injury occurrences, however, increased in 2012. For example, an ankle sprain and wrist inflammation, each occurring in the last two months of the season, forced Mr. Fowler to miss several games.⁵⁵ While not high on the list of concerns, these

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²⁵ Id.
late season injuries create some questions as to whether Mr. Fowler is taking appropriate care of himself, or if his durability may be diminishing.

VII. Recent Performance of the Club

The Rockies team performance of late has been dismal. Largely due to the lowest-ranked pitching staff in MLB combined with the benefit Coors Field offers hitters, the Club finished second to last in the Division in 2011 and last in 2012.\(^56\) In 2012, the Rockies’ offense ranked 6\(^{th}\) in Runs, 2\(^{nd}\) in Batting Average, 6\(^{th}\) in On Base Percentage, and 4\(^{th}\) in Slugging Percentage.\(^57\) Mr. Fowler’s individual contributions to the Rockies’ offensive performance played a notable role in the team’s overall production.

VIII. Conclusion

In closing, Mr. Fowler is a valuable asset to the Colorado Rockies, providing solid batting numbers despite his limited utility in center field. However, compared to other center fielders, especially those garnering salaries above the $4.3 million midpoint, Mr. Fowler’s base-running and fielding abilities are mediocre and even substandard in some areas. Mr. Fowler’s hitting production at home in 2012 was unquestionably improved. However, the remainder of Mr. Fowler’s platform and career contributions are those of a consistently average hitter, who is among the least productive base-stealers at a position known for speed, and who exhibits substandard defensive skills. These factors lead the Club to believe a 2013 salary of $4 million is reasonable for Mr. Fowler.

Thank you for your consideration.

Respectfully,

Team 22

\(^56\) Colorado Rockies. ESPN. [http://espn.go.com/mlb/standings](http://espn.go.com/mlb/standings)

\(^57\) Id. at [http://espn.go.com/mlb/team/_/name/col/colorado-rockies](http://espn.go.com/mlb/team/_/name/col/colorado-rockies)