2013 National Baseball Arbitration Competition

IN THE MATTER BETWEEN

-AND-

THOMAS J "TOMMY" HANSON
($4.3 million)

THE ATLANTA BRAVES
($3.5 million)

BRIEF IN SUPPORT OF TOMMY HANSON

- Team 34 -
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I. Introduction and Request for Hearing Decision

This matter, by and between Thomas J "Tommy" Hanson ("Hanson") and the Atlanta Braves ("Braves"), has been brought forth for the purpose of establishing Hanson’s salary for the 2013 season. Pursuant to the Collective Bargaining Agreement ("CBA") of Major League Baseball ("MLB"), Hanson is eligible, with 3.120 years of MLB service, to submit the issue of his 2013 salary to final and binding arbitration. Through the tendering of this brief, Hanson desires to exercise this right and respectfully requests an arbitration hearing to resolve this matter. Hanson is requesting $4.3 million and the Braves are offering $3.5 million.

Based on the six criteria set forth in the CBA, the value of Hanson’s services exceeds the $3.9 million midpoint. It is well aligned with Hanson’s $4.3 million request, as measured by the prevailing standards of today’s marketplace. Thus, Hanson respectfully requests the Arbitration Panel ("Panel") appropriately find that he is entitled to a 2013 arbitration award of $4.3 million.

II. Quality of Hanson’s Contribution During the Past Season

On April 5th, 2012, the Atlanta Braves began their playoff-bound season with their ace Tommy Hanson on the mound.1 Then 25 years old, Hanson was the youngest opening day starter in Braves history since the legendary John Smoltz. Hanson started 31 games for the Braves that year; the Braves' record in Hanson's starts was 20-11, a .645 percentage, well above the Braves' win percentage in other games, .564.2 Hanson's .645 team win-loss percentage ranked 19th among the 125 starting pitchers with 20 or more games started.3 Among the 286 pitchers that started a game in 2012, only 33 of them had more wins than Hanson.4

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4 Id.
Hanson's 31 starts made him one of the major league's top workhorses in 2012; the most starts of any pitcher was 34. Recovering from a bout with shoulder tendinitis the previous season, he retooled his delivery and rebounded to pitch 174.2 innings. Although the delivery is different, the result remains the same: his 8.3 strikeouts per 9 innings in 2012 matches his career average of 8.4 strikeouts per 9 innings. In addition, Hanson's new, quicker delivery turned him into one of the harder pitchers to steal (base) against; his stolen base percentage dropped from 91% to 74%. Hanson's 4.48 ERA in 2012 was better the league average ERA of 4.88 for starting pitchers. All in all, Hanson continued to do in 2012 what he has always done best: use an arsenal of quality pitches to make batters routinely miss.

III. Length and Consistency of Career Contributions

Hanson has made batters miss since his pro debut in 2009. Hanson's magic is found in three pitches: a fastball, a slider, and a curve. Of these, his slider and his curve are the most fearsome. His fastball, not deadly on velocity alone, is made potent by its movement and the batter's fear of his more lethal slider and curve. Since his 2009 debut, Hanson has used this arsenal to strike out 592 batters in 635 innings. Despite a two mile-per-hour reduction in

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5 Id.
6 Id.
7 Id.
8 Id.
11 Baseball Reference, “Tommy Hanson, filtered by baserunning situation”, http://www.baseball-reference.com/players/h/hansoto01-pitch.shtml#pitching_basesituation::none
12 Baseball Reference, “Tommy Hanson,” supra.
16 Id.
17 Baseball Reference, “Tommy Hanson,” supra.
fastball velocity during this four year span,\textsuperscript{18} or perhaps because of the increased movement of his new, lower-velocity two-seam fastball,\textsuperscript{19} his strikeout rate (strikeouts per nine innings, "K/9", or "SO/9") has remained constant: 8.2 in 2009, 7.7 in 2010, 9.8 in 2011, and 8.3 in 2012.\textsuperscript{20} This strikeout rate is exceptionally high; his strikeout rate in 2011 ranks 9th all-time among all 24 year-old starting pitchers in the history of the game.\textsuperscript{21}

Hanson has buzz-sawed through batters and innings since his major league debut. In 2009, after the Braves delayed Hanson's start until June to delay his arbitration clock, he still finished 4th among all National League ("NL") rookies in both starts and innings.\textsuperscript{22} That year, on the back of an 11-4 record and a 2.89 ERA, achieved in only two-thirds of a season, the 22-year-old phenom earned third place in NL Rookie of the Year honors.\textsuperscript{23}

In 2010, Hanson ranked 17th among starting pitchers in the NL with 202.2 innings pitched.\textsuperscript{24} Hanson was one of only five NL starting pitchers to start at least 34 games.\textsuperscript{25} After this feat of endurance, the 23-year-old owned a solid 3.33 ERA. Ranked by ERA, Hanson placed 17th among 45 starting pitchers in the NL.\textsuperscript{26}

In 2011, he posted another strong statistical season, with a 3.60 ERA and a low H/9 of 7.3 hits per nine innings (his H/9 ranked 4th among 49 major league starting pitchers).\textsuperscript{27} Hanson

\begin{itemize}
\item \textsuperscript{18} FanGraphs, "Hanson Pitch Types", \textit{supra}.
\item \textsuperscript{20} Baseball Reference, "Tommy Hanson", \textit{supra}.
\item \textsuperscript{22} MLB.com, "Tommy Hanson Bio", http://losangeles.angels.mlb.com/team/player.jsp?player_id=462102.
\item \textsuperscript{23} Baseball Reference, "Tommy Hanson", \textit{supra}.
\item \textsuperscript{24} Id.
\item \textsuperscript{26} Baseball Reference, "2010 Qualified Starting Pitchers in National League Ranked by ERA" http://www.baseball-reference.com/leagues/NL/2010-standard-pitching.shtml#players_standard_pitching::7, (includes only "qualified" pitchers: those with at least 26 starts or 160 innings pitched).
\end{itemize}
Tommy Hanson is a consistent winner with a 45-32 win-loss record over his four-year career. By way of comparison, the Braves winning percentage over this same period is .562, lower than Hanson's .584. Hanson is among an elite cohort; of those 57 starting pitchers playing from 2009 to 2012 age 26 or younger in 2012, only six have more wins, and three of those six are Cy Young Award recipients. Among that same group, Hanson has pitched more innings than all but seven, and started more games than all but six. Hanson's ERA over this four-year, 600-plus-inning span is a praiseworthy 3.61.

IV. Past Compensation

Despite his stellar production, Hanson has been compensated near the league minimum in each of his full seasons: just $435,000 in 2010, $456,500 in 2011, and $535,000 in 2012. As a first-year arbitration eligible player, Hanson is due a substantial raise from his 2012 salary. Hanson's request of $4,300,000 is befitting of a player with such elite and consistent production.

V. Comparative Baseball Salaries

If the Panel deems that Hanson's final offer is most compelling, he will earn in line with other elite and consistent performers. Five comparable players are described below. These players illustrate why Hanson's offer of $4,300,000 is fair and reasonable. By every scale, Hanson measures well north of the $3,900,000 midpoint.

28 Baseball Reference, “Tommy Hanson”, supra.
29 Id.
30 Id.
32 FanGraphs, "Pitching Leaders filtered by 2009-2012 and age below 26", http://www.fangraphs.com/leaders.aspx?pos=all&stats=sta&lg=all&qual=300&type=8&season=2012&month=0&season1=2009&ind=0&team=0&roster=0&age=22,26&filter=players=0&sort=3,d, (the Cy Young award recipients are Clayton Kershaw, David Price, and Felix Hernandez).
33 Id.
34 Baseball Reference, “Tommy Hanson”, supra.
**A. Justin Masterson, 3.108 Service Time, $3,825,000**

After 2011, Justin Masterson was a first-year arbitration eligible player with 3.108 service time. That year, he had made $468,000. After arbitration, his 2012 salary jumped to $3,825,000, just $75,000 below Hanson's midpoint. The chart below compares each player's statistics. Masterson had an abnormally good platform year; a more reliable measure, one that negates noisy statistical fluctuations, is his career production, and it fell well short of Hanson's. Hanson won 17 more games, pitched 21 more innings, started 19 more games, walked 28 fewer batters, and allowed 22 fewer earned runs than Masterson. A question for the Panel: do Hanson's 17 extra career wins justify a modest $75,001 of additional compensation?

<table>
<thead>
<tr>
<th>Player Name</th>
<th>Age (on June 30th)</th>
<th>Wins</th>
<th>Losses</th>
<th>Innings Pitched</th>
<th>ERA</th>
<th>Games Started</th>
<th>HR/9</th>
<th>BB/9</th>
<th>SO/9</th>
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<tbody>
<tr>
<td><strong>2012</strong></td>
<td>Tommy Hanson</td>
<td>25</td>
<td>13</td>
<td>174.2</td>
<td>4.48</td>
<td>31</td>
<td>1.4</td>
<td>3.7</td>
<td>8.3</td>
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<tr>
<td><strong>2011</strong></td>
<td>Justin Masterson</td>
<td>26</td>
<td>12</td>
<td>216.0</td>
<td>3.21</td>
<td>33</td>
<td>0.5</td>
<td>2.7</td>
<td>6.6</td>
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**2009-2012** Tommy Hanson -

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<tr>
<th>Player Name</th>
<th>Age (on June 30th)</th>
<th>Wins</th>
<th>Losses</th>
<th>Innings Pitched</th>
<th>ERA</th>
<th>Games Started</th>
<th>HR/9</th>
<th>BB/9</th>
<th>SO/9</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2008-2011</strong> Justin Masterson</td>
<td>26</td>
<td>28</td>
<td>38</td>
<td>613.2</td>
<td>3.92</td>
<td>87</td>
<td>0.7</td>
<td>3.5</td>
<td>7.1</td>
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**B. Rick Porcello, 2.170 Service Time, $3,100,000**

Rick Porcello was, after his 2011 season, a first-year arbitration eligible player with 2.170 service time. That year, he had made $1,536,000. After arbitration, his 2012 salary was set at $3,100,000. The chart below compares each player's statistics. The players are statistical doppelgangers, with Hanson having a slight superiority in every category, with one million-dollar exception: ERA. Hanson, over his four-year, 600-plus inning career, has a cumulative ERA nearly a full run better than Porcello's. Is a .93 difference in ERA worth $800,001?

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36 Id.
37 Rate state comparisons use 635 innings for both players.
39 Id.
40 Id.
Consider the difference between Masterson and Porcello in both ERA and compensation. Masterson's career ERA heading into arbitration was 3.92, or .62 better than Porcello. The two players were otherwise similar. However, Masterson earned $725,000 more than Porcello. Applying this same ratio to Hanson, that is, $725,000 in compensation per .62 in ERA improvement, Hanson's proper salary increment would be $1,087,500 greater than Porcello, or $4,187,500. Thus, Hanson deserves to earn at least $3,900,001.

<table>
<thead>
<tr>
<th>Player Name</th>
<th>Age (on June 30th)</th>
<th>Wins</th>
<th>Losses</th>
<th>Innings Pitched</th>
<th>ERA</th>
<th>Games Started</th>
<th>HR/9</th>
<th>BB/9</th>
<th>SO/9</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tommy Hanson</td>
<td>25</td>
<td>13</td>
<td>10</td>
<td>174.2</td>
<td>4.48</td>
<td>31</td>
<td>1.4</td>
<td>3.7</td>
<td>8.3</td>
</tr>
<tr>
<td>Rick Porcello</td>
<td>22</td>
<td>14</td>
<td>9</td>
<td>182.0</td>
<td>4.75</td>
<td>31</td>
<td>0.9</td>
<td>2.3</td>
<td>5.1</td>
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**Cumulative**

<table>
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<tr>
<th>Player Name</th>
<th>Age (on June 30th)</th>
<th>Wins</th>
<th>Losses</th>
<th>Innings Pitched</th>
<th>ERA</th>
<th>Games Started</th>
<th>HR/9</th>
<th>BB/9</th>
<th>SO/9</th>
</tr>
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<tbody>
<tr>
<td>Tommy Hanson</td>
<td>-</td>
<td>45</td>
<td>32</td>
<td>635.0</td>
<td>3.61</td>
<td>108</td>
<td>1.0</td>
<td>3.1</td>
<td>8.4</td>
</tr>
<tr>
<td>Rick Porcello</td>
<td>-</td>
<td>38</td>
<td>30</td>
<td>515.0</td>
<td>4.54</td>
<td>89</td>
<td>1.0</td>
<td>2.3</td>
<td>5.0</td>
</tr>
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**C. Max Scherzer, 3.079 Service Time, $3,750,000**

Max Scherzer, in his first year of eligibility at 3.079 service time, increased his 2011 salary of $600,000 to $3,750,000 in 2012. Max, in 2011, strikes a remarkable similarity to Hanson, in 2012. Examine their platform years: they are identical, right down to their ERA, starts, win-loss, and strikeout rate. But Hanson's long-term track record of results is far superior. Hanson has a better ERA, more wins, and more innings. The difference between Scherzer's salary and Hanson's midpoint is $150,000. The difference between Scherzer's and Hanson's long-term performance is that Hanson has 9 more wins, 3 fewer losses, 18 more innings, 7 more starts, and a .31 better ERA. This performance delta justifies $150,001 of additional compensation.
D. Luke Hochevar, 3.151 Service Time, $3,510,000

Luke Hochevar offers another comparison to Tommy Hanson. In 2011 Hochevar, a "Super 2" in 2010, entered his second year of eligibility at 3.151 service time. His salary jumped from $1,760,000 to $3,510,000. Hanson's performance was better than Hochevar's by nearly every measure, especially in the most important categories like ERA. Although Hanson's midpoint is $390,000 higher than Hochevar's awarded salary, the difference is more than justified. Hanson had the better platform year. More to the point, Hanson shames Hochevar on a career basis: Hanson's 45-32 win-loss record is nearly the inverse of Hochevar's 30-43. Hanson pitched 49.1 more innings, in less service time than Hochevar, and had 12 more games started. Hanson's ERA is an elite 3.61 over his four MLB seasons; Hochevar's ERA is a tragic 5.29 over that span. The difference between Hochevar and Hanson is the difference between a serviceable pitcher and an elite pitcher. Hanson's elite talent is worth much more than the $390,000.

E. David Price, 2.164 Service Time, $4,350,000

The final, and most fitting comparison to Tommy Hanson is the 2011 season and subsequent arbitration of David Price. After the 2011 season, David Price entered his first year of eligibility as a "Super 2" with 2.164 years service time. Price's salary was set at $4,350,000 after the arbitration process. The two players have nearly identical win-loss records measured by both platform year and career contribution, although Hanson's totals edge Price by that measure. On a career basis, Price has a slight edge compared to Hanson in terms of ERA; however, the .23
difference is merely a marginal increment, of much smaller magnitude than the differences between Hanson and the other comparable players. Furthermore, Hanson has more starts, more wins, and a higher strikeout rate than Price. Because Hanson has performed at an elite level just as Price did, his 2013 salary should be reflective of Price's $4,350,000 salary.

<table>
<thead>
<tr>
<th>Platform Year</th>
<th>Player Name</th>
<th>Age (on June 30th)</th>
<th>Wins</th>
<th>Losses</th>
<th>Innings Pitched</th>
<th>ERA</th>
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<td>174.2</td>
<td>4.48</td>
<td>31</td>
<td>1.4</td>
<td>3.7</td>
<td>8.3</td>
</tr>
<tr>
<td>2011</td>
<td>David Price</td>
<td>26</td>
<td>12</td>
<td>13</td>
<td>224.1</td>
<td>3.49</td>
<td>34</td>
<td>0.9</td>
<td>2.5</td>
<td>8.7</td>
</tr>
</tbody>
</table>

F. Summary of Comparable Salaries

Of the five players most comparable to Tommy Hanson, all five justify a salary above the $3,900,000 midpoint of Hanson's arbitration, even without applying the empirically observed 6.9% annual growth rate to average player salary that has been witnessed from 1996 to 2012.41

Hanson's first "comp" was Masterson. Although Hanson one-upped Masterson on virtually every axis, Hanson's 17 extra wins alone is enough to bridge the $75,000 gap between Masterson's salary and the $3,900,000 midpoint. Next, Hanson's career .93 ERA advantage over Porcello more than covers the ground between $3,100,000 and $3,900,000. Max Scherzer, Hanson's platform-year-identical-twin, made $3,750,000 after that year; Hanson's long-term track record of 9 more wins, 18 more innings, 7 more starts, and a .31 better ERA justify compensation in excess of the $150,000 salary difference. The only player that provides a realistic template for what Tommy Hanson deserves is David Price. Price, after performing in an elite manner like Hanson, was awarded a salary of $4,350,000, perfectly in line with Hanson's fair and reasonable request of $4,300,000.

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VI. Existence of Physical or Mental Defects

Injuries are part of doing business in professional sports. In baseball, each of the 900 or so players faces the real possibility that he will lose some time to injury. A recent peer-reviewed medical study of major league baseball found that each MLB season has an average of 438.9 players per year placed on the disabled list ("DL"). It is not unusual for a player to visit the DL at some point during a long span of professional baseball.

In 2011, Hanson went on the DL for shoulder tendonitis. After a 15-day rest, he returned to pitch another 8 games. Then, Hanson and the Braves opted for more rest. Rather than power through the remainder of a scorching 2011 campaign, they elected to pull fuel from the afterburners and put the Hanson warbird in the hanger. Hanson did not undergo surgery. In the ensuing offseason, on advice of the team physical therapist, Hanson retooled his delivery.

Three changes marked Hanson's new delivery. First, he changed his fastball grip from a four-seam to a two-seam grip, which resulted in a slight drop in velocity but an increase in movement. Second, he eliminated the "deceleration issue" that resulted in a violent arm recoil at the end of each throw, so that he no longer has the recoil issue, which had presumably put the unwanted stress on his shoulder. That is, his new delivery is smoother and less likely to awaken his tendinitis. Finally, he improved his ability to prevent stolen bases by shortening his delivery time from 1.9 seconds to 1.5 seconds. Opponents were successful when stealing base against Hanson 91% of attempts; but in 2012, that number dropped to 74%.

43 Baseball Reference, “Tommy Hanson,” supra.
44 Mark Bowman, Delivery adjusted, Hanson no longer hits pause, supra.
45 Jim Pratt, Atlanta Braves: Tommy Hanson's Drop in Velocity a Positive? Bleacher Report, supra.
47 Mark Bowman, Delivery adjusted, Hanson no longer hits pause, supra.
Hanson showcased his new mechanics in 2012, turning in a 9-4 win-loss, 3.59 ERA performance through the first half of the season. Hanson remains as lethal as ever with his restocked arsenal of pitching weaponry. And, with the smoother delivery, he's more bulletproof.

VII. Recent Club Performance of the Club

In his four seasons with the Braves, Hanson posted a .584 Win-Loss percent, outpacing the Braves .556 Win-Loss percent over that period. Hanson led the Braves in 2010 to a return to the playoffs after a five-year hiatus. This past year, the Braves won 94 games and participated in the NL Wild Card game. Hanson started 20 of those 94 wins.

During Hanson's tenure as ace, the Braves have been a perennial playoff contender, riding the back of their team pitching: The Braves 3.65 team ERA ranked 2rd of 30 teams over the span. Hanson, team ace and opening day starter, has been the heart of that strength, and a core reason for the team's strong performance over that span.

VIII. Conclusion

After reviewing the standard criteria for determining Hanson's 2013 player salary, it is apparent that Hanson's request of $4,300,000 is a fair request. Hanson is an elite workhorse with a proven history of dispatching innings and batters alike. He deserves pay in line with that performance. Measured against the five best comparable player salaries, Hanson's proper salary is north of $3,900,000. With these similarly situated players in mind, Hanson respectfully asks that the Arbitration Panel find that $4,300,000 is a fair and reasonable offer.

48 Baseball Reference, “Tommy Hanson,” supra.
49 Id.
50 Baseball Reference, “Atlanta Braves”, supra.
51 Id.
52 Baseball Reference, “Tommy Hanson,” supra.
53 Fangraphs, "Team Pitching, 2009-2012" http://www.fangraphs.com/leaders.aspx?pos=all&stats=sta&lg=all&qual=0&type=8&season=2012&month=0&season1=2009&ind=0&team=0,ts&rost=0&age=22,26&filter=&players=0&sort=15,d, (the only team with a better team ERA is the San Francisco Giants, who won two World Series in that four year span, and also have a much more pitcher-friendly ballpark).