2013 NATIONAL BASEBALL ARBITRATION COMPETITION

Dexter Fowler v. Colorado Rockies Baseball Club

SUBMISSION ON BEHALF OF DEXTER FOWLER

Submitted by: Team 5
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**Arbitration Eligibility and Request for Hearing Decision:**

This brief is submitted on behalf of Mr. Dexter Fowler (“Fowler”), center fielder (“CF”) for the Colorado Rockies (the “Club” or the “Rockies”), regarding his salary for the 2013 Major League Baseball (“MLB”) season. Under MLB’s current Collective Bargaining Agreement (“CBA”), a player typically becomes eligible to demand final and binding salary arbitration after accumulating three or more years of Major League service (“MLS”) but not exceeding six years.¹ Mr. Fowler qualified for his first year of arbitration after 2011 but negotiated a $2.35 million (“M”) one-year contract for 2012.² Having accumulated 3.168 years of MLS,³ Mr. Fowler is now eligible for his second year of arbitration and respectfully requests that this panel award him a salary of $4.6M for the upcoming season instead of the Club’s final offer of $4.0M.

**Standards of Admissible Evidence:**

In support of Mr. Fowler’s request, this brief analyzes the statistics, attributes, accomplishments, and overall quality of Mr. Fowler’s platform season and career performance, addresses the recent performance of the Club, considers his previous compensation, and uses statistics and salaries of similarly situated players as points of comparison. Such criteria are admissible under CBA Article VI (E)(10)(a).

**Introduction:**

At only 26 years of age, Mr. Fowler has distinguished himself as an elite-level hitter, a consistent run producer, and a catalytic well-rounded team contributor. Sparking the Rockies’ offense, Fowler has scored 305 times, slugged 28 home runs (“HR”), and knocked in 168 runs (“RBI”).⁴ Having also legged out 50 triples (“3B”), stolen 64 bases (“SB”), walked (“BB”) 260

¹ *MLB Collective Bargaining Agreement*, Article VI (E) § (1)(a) (b), at 17-8.
³ *Id.*
⁴ http://www.baseball-reference.com/players/f/fowlede01.shtml. All Fowler stats from here except otherwise noted.
times, batted to a .271 career average ("AVG"), and accumulated a .791 On-Base-Plus Slugging Percentage ("OPS") and .983 fielding percentage ("FLD%") Fowler has emerged as an elite defender and premier hitter who combines power, speed, and an uncanny ability to consistently reach base and to put his team in a position to score. After finishing 8th in the 2009 National League ("NL") Rookie of the Year Award voting, Fowler has consistently improved in each successive season, posting career highs during his platform season in total hits ("H"), AVG, HR’s, RBI’s, On-Base Percentage ("OBP"), Slugging Percentage ("SLG"), and OPS.

With a distinguished platform season that demonstrated veteran-level plate discipline, consistent hitting, notable run production and explosive speed, Mr. Fowler deserves a substantial raise over the $2.35M salary he received in 2012. Accordingly, Mr. Fowler respectfully requests that this panel award him $4.6M for the 2013 season.

**ARGUMENT:**

I. **MR. FOWLER’S DISTINGUISHED CATALYTIC AND WELL-ROUNDED PERFORMANCE POSITIONS HIM AS AN ELITE-LEVEL CENTER FIELDER DESERVING OF HIS REQUESTED $4.6M SALARY.**

Mr. Fowler burst onto the MLB scene in his rookie season, ranking among the elite outfielders ("OF"), flashing speed, hitting consistently, and demonstrating an uncanny ability to get on base. With 27 SB’s and 10 3B’s, Fowler ranked 11th and 3rd among outfielders in such categories, evidencing a distinguished ability to place his team in prime scoring position. At only 23 years of age, Fowler further demonstrated notable composure and reliability as he posted a .266 AVG, drew 67 BB’s (17th among OF’s), and accumulated a .363 OBP (21st among OF’s), proving him a catalyst in team run production and essential to the Club’s successful 92 win

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5 *Id.*
Among other rookie hitters with 300+ At-Bats ("AB") in 2009, Fowler ranked 1st in 3B’s, 6th in total H’s, 3rd in runs scored, 2nd in SB’s, 1st in BB’s, and 5th in OBP, earning him 8th place in the NL Rookie of the Year voting and recognition as a rising star player. The table below shows Fowler’s 2009 statistics.

<table>
<thead>
<tr>
<th>Season</th>
<th>G</th>
<th>R</th>
<th>H</th>
<th>3B</th>
<th>HR</th>
<th>RBI</th>
<th>BB</th>
<th>SB</th>
<th>AVG</th>
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<tr>
<td>2009</td>
<td>135</td>
<td>73</td>
<td>115</td>
<td>10</td>
<td>4</td>
<td>34</td>
<td>67</td>
<td>27</td>
<td>.266</td>
<td>.363</td>
<td>.406</td>
<td>.769</td>
</tr>
</tbody>
</table>

Fowler carried the momentum of his successful rookie year into both his 2010 and 2011 seasons as he not only sustained his distinguished hitting consistency and ability to get on base but also increased his power productivity. In 2010, Fowler ranked 1st among all MLB hitters with 14 triples and increased his SLG to .410 while also maintaining his AVG, R, HR, and RBI numbers. In 2011, Fowler improved his performance again as his production ranked even higher among MLB’s elite OF’s. Fowler scored a career high 84 runs (17th among OF’s), matched his rookie season OBP rate of .363 (15th among OF’s), smacked 55 total extra base hits [including 15 triples (1st among OF’s)], added a then-career high 45 RBI’s, and accumulated a .432 SLG and .796 OPS (26th among OF’s). He also proved equally productive at home in Colorado (.245 AVG, 3 HR’s, .811 OPS) and during away games (.286, 2 HR’s, .782 OPS). Fowler’s 2010 and 2011 season statistics are shown below.

<table>
<thead>
<tr>
<th>Season</th>
<th>G</th>
<th>R</th>
<th>H</th>
<th>3B</th>
<th>HR</th>
<th>RBI</th>
<th>BB</th>
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<tr>
<td>2010</td>
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<td>73</td>
<td>114</td>
<td>14</td>
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<td>36</td>
<td>57</td>
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<tr>
<td>2011</td>
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<td>84</td>
<td>128</td>
<td>15</td>
<td>5</td>
<td>45</td>
<td>68</td>
<td>12</td>
<td>.266</td>
<td>.363</td>
<td>.432</td>
<td>.795</td>
</tr>
</tbody>
</table>

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Following the 2011 season, Fowler qualified for his first year of arbitration eligibility and subsequently signed a one-year contract with the Rockies for $2.35M for the 2012 season. This salary represented a $1.926M raise over the $424,000 base that he earned in 2011.\footnote{Fowler Player Card.} If Mr. Fowler receives this same raise amount in 2013, then he will essentially reach the $4.3M midpoint salary between the Club’s $4.0M offer and his $4.6M request. Consideration of the midpoint salary in this hearing is critical because if Mr. Fowler can prove that he deserves even one dollar more than this midpoint, then this panel must award Fowler his full $4.6M request.

Where Mr. Fowler received this $1.926M raise on the basis of statistics that he has since bested in 2012, logic follows that he should now receive a greater raise. Since such a raise will push him over the $4.3 midpoint, this panel must award Mr. Fowler his full $4.6M request.

As the bolded statistics below indicate, Mr. Fowler significantly surpassed both his 2011 production and averages based on his 2009-11 seasons.

<table>
<thead>
<tr>
<th>Season</th>
<th>G</th>
<th>R</th>
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<th>HR</th>
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<tr>
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<td>143</td>
<td>72</td>
<td>136</td>
<td>11</td>
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<td>68</td>
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<td>.863</td>
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<tr>
<td>2011</td>
<td>125</td>
<td>84</td>
<td>128</td>
<td>15</td>
<td>5</td>
<td>45</td>
<td>68</td>
<td>12</td>
<td>.266</td>
<td>.363</td>
<td>.432</td>
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<table>
<thead>
<tr>
<th>Season</th>
<th>G</th>
<th>R</th>
<th>H</th>
<th>3B</th>
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<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
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</thead>
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<tr>
<td>Platform</td>
<td>143</td>
<td>72</td>
<td>136</td>
<td>11</td>
<td>13</td>
<td>53</td>
<td>68</td>
<td>12</td>
<td>.300</td>
<td>.389</td>
<td>.474</td>
<td>.863</td>
</tr>
<tr>
<td>Avg. 09-11</td>
<td>130.7</td>
<td>76.7</td>
<td>119</td>
<td>13</td>
<td>5</td>
<td>38.3</td>
<td>64</td>
<td>17.3</td>
<td>.264</td>
<td>.358</td>
<td>.417</td>
<td>.775</td>
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</table>

In 2012, Fowler played in a career-high 143 G’s and set highs in H’s, HR’s, RBI’s, AVG, OBP, SLG, OPS, significantly outpacing his pre-2012 performance average in each of those key hitting categories. His most noticeable improvement in 2012 was his increased level of power. Fowler more than doubled his 2011 season HR output and season average by slugging 13 HR’s; he added 8 more RBI’s than in 2011 (15 more than his season average) and increased his SLG by 42 points. While maintaining his distinguished ability to hit triples (2\textsuperscript{nd} among all OF’s), Fowler
even showed significant improvement in categories that had previously earned him praise and elite status as a well-rounded contributor. Fowler increased his AVG by 34 points in his platform year as his .300 AVG ranked him 10th among MLB OF’s, and he accumulated a distinguished .389 OBP that not only bested his previous career high by 26 points but also positioned him 4th among OF’s. Matching his career high in BB’s with 68 and posting a .863 OPS that shattered his 2011 high by 67 points and ranked him 7th among OF’s in 2012, Fowler combined new-found power with refined plate discipline and an even more pronounced ability reach base and put his team in a position to score.13 Fowler similarly proved to be among MLB’s most elite lead-off hitters as his .848 OPS when batting first in the Rockies’ order ranked him 5th and his .384 OBP ranked him 4th among all lead-off hitters with 200+ AB’s.14 That 28 of the Rockies’ wins occurred where Fowler reached base multiple times and/or homered15 proves how pivotal he was to the team’s success especially considering that the Rockies only managed a middling 64-98 overall record.16 Without Fowler as the Club’s catalyst, the Rockies likely would have been mired in further mediocrity and lost even more games.

Fowler’s 2012 platform season unquestionably proves to be his best yet. He ranked higher among OF’s in the key hitting categories than in previous seasons and reached elite levels with combined power, speed, hitting consistency, and an uncanny ability to get on base. As a more dominant OF who produced a platform season performance that either matched, approached, or significantly surpassed the statistical output that earned him a $1.926M raise after 2011, Fowler now merits a raise considerably greater than his previous increase. Since such a raise would push him over the $4.3M midpoint in this case, this panel must award Mr. Fowler his $4.6M request.

While the above analysis proves convincing per se, comparison of Fowler’s platform year and career performance to similarly situated outfielders who contribute power, speed, hitting consistency, and an ability to get on base demands that this panel recognize Fowler as an elite and catalytic hitter and award him his $4.6M request that compares equitably to such outfielders.

II. ANALYSIS OF SIMILARLY SITUATED OUTFIELDER STATISTICS AND SALARIES DEMANDS THAT THIS PANEL RECOGNIZE MR. FOWLER AS COMPARABLY DOMINATING AND AWARD HIM HIS REQUESTED $4.6M SALARY.

A. DEXTER FOWLER V. MARTIN PRADO

Mr. Fowler should be compared to well-rounded contributors who signed one-year contracts after reaching their second year of arbitration eligibility. Fellow OF Martin Prado, who signed such a contract for $4.75M for the 2012 season,\(^{17}\) provides a strong basis for comparison. Prado’s salary exceeds Fowler’s request and sets a high point for comparison. As such, if Fowler matches, approaches, or outperforms Prado, then he should be paid similarly to Prado and be awarded his $4.6M request. The chart below compares both players’ platform and career statistics and shows in bold where Fowler matches, approaches, or outperforms Prado in the key categories that measure well-rounded hitting ability and catalytic performance.\(^{18}\)

<table>
<thead>
<tr>
<th>Platform</th>
<th>G</th>
<th>R</th>
<th>H</th>
<th>3B</th>
<th>HR</th>
<th>RBI</th>
<th>BB</th>
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<tbody>
<tr>
<td>Fowler</td>
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<td>12</td>
<td>.300</td>
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<td>.474</td>
<td>.863</td>
</tr>
<tr>
<td>Prado ‘11</td>
<td>129</td>
<td>66</td>
<td>143</td>
<td>2</td>
<td>13</td>
<td>57</td>
<td>34</td>
<td>4</td>
<td>.260</td>
<td>.302</td>
<td>.385</td>
<td>.687</td>
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</table>

<table>
<thead>
<tr>
<th>Career</th>
<th>G</th>
<th>R</th>
<th>H</th>
<th>3B</th>
<th>HR</th>
<th>RBI</th>
<th>BB</th>
<th>SB</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fowler</td>
<td>548</td>
<td>305</td>
<td>497</td>
<td>50</td>
<td>28</td>
<td>168</td>
<td>260</td>
<td>64</td>
<td>.271</td>
<td>.364</td>
<td>.427</td>
<td>.791</td>
</tr>
<tr>
<td>Prado</td>
<td>527</td>
<td>274</td>
<td>566</td>
<td>10</td>
<td>42</td>
<td>216</td>
<td>139</td>
<td>13</td>
<td>.293</td>
<td>.341</td>
<td>.434</td>
<td>.775</td>
</tr>
</tbody>
</table>

That Fowler approaches and/or matches Prado in total H’s, HR’s, and RBI’s in their respective platform season positions Fowler as an equally effective hitter and run producer.


\(^{18}\) http://www.baseball-reference.com/players/p/pradoma01.shtml. All Prado stats from here unless otherwise noted.
However, Fowler significantly outperforms Prado in the remaining 8 categories, proving Fowler the more effective, dominant, and solid contributor. As Fowler smacked 9 more triples and added 8 more SB’s than Prado, Fowler proves more explosive than Prado. Where Fowler’s distinguished .300 AVG ranked him 10th overall among OF’s in 2012, notable .389 OBP placed him 4th among that same group, and elite .863 OPS positioned him 7th overall also among that group in 2012,19 Prado only ranked 37th, 50th, and 51st respectively among outfielders in his 2011 platform season.20 Fowler therefore proves the more consistent and elite outfielder. That Fowler also matches or surpasses Prado in 8/12 career categories, significantly outshining him in R’s, 3B’s, SB’s, OBP, and OPS categories, demonstrate Fowler as the more well-rounded, productive, and catalytic contributor. Accordingly, Mr. Fowler deserves recognition as a comparably elite, consistent, and dominant slugger who produced a more effective and distinguished platform season and career performance. Mr. Fowler should therefore be compensated similarly to Prado with his $4.6M request.

B. DEXTER FOWLER v. MICHAEL BOURN:

Beyond the convincing analysis of Fowler v. Prado, a comparison with fellow CF Michael Bourn adds weight to Mr. Fowler’s request. Mr. Bourn represents an essential benchmark since his $4.4M 2011 salary21 just slightly exceeds the midpoint between the Club’s $4.0M offer and Mr. Fowler’s $4.6M request. As such, in order to receive his salary, Mr. Fowler need only demonstrate that he matched Bourn’s performance level when Bourn received that salary.

As the bolded statistics below indicate, Fowler not only reached Bourn’s level, but also significantly surpassed his production in both platform season and career-to-date performances.²²

<table>
<thead>
<tr>
<th>Platform</th>
<th>G</th>
<th>R</th>
<th>H</th>
<th>3B</th>
<th>HR</th>
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<th>BB</th>
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<tr>
<td>Bourn ’10</td>
<td>141</td>
<td>84</td>
<td>142</td>
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<td>2</td>
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<th>HR</th>
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<td>260</td>
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<td>Bourn</td>
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<td>25</td>
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<td>108</td>
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<td>173</td>
<td>.263</td>
<td>.331</td>
<td>.348</td>
<td>.679</td>
</tr>
</tbody>
</table>

In their respective platform years, Fowler demonstrated more well-rounded productivity than Bourn by slugging 11 more HR’s, adding 15 more RBI’s, and hitting 5 more triples. Where Fowler’s 2012 production ranked him 13th, 13th, and 2nd among CF’s respectively in those same categories,²³ Bourn proved the less elite offensive centerfielder by only ranking 31st, 14th, and 7th respectively in his 2010 platform year.²⁴ Fowler bested Bourn in AVG by 35 points, OBP by 58 points, SLG by 128 points, and OPS with an emphatically disproportionate 176 points. Where Fowler ranked 10th, 4th, 21st, and 7th among all OF’s in those categories respectively in 2012,²⁵ Bourn only ranked 32nd, 32nd, 50th, and 46th respectively among that same group in his platform year.²⁶ Based on the significant differences between these statistics and rankings, Fowler proves the more elite and productive player in their respective platform seasons. As Bourn earned a $2.0M raise after his 2011 platform season,²⁷ and Fowler approached or bested Bourn in 10 out of 12 of the key hitting categories in their respective platform seasons, then Fowler should earn a raise in 2013 that at least equals Bourn’s. This minimum raise, added to the $2.35M that Fowler

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²² http://www.baseball-reference.com/players/b/bournmi01.shtml. Bourn stats from here unless otherwise noted.
earned in 2012,\footnote{Fowler Player Card.} means that Fowler would hypothetically earn a $4.35M minimum salary for 2013. Where this number falls above the midpoint between the Club’s offer and Mr. Fowler’s request in this case, this panel must award Mr. Fowler his requested $4.6M salary.

The comparison of Fowler’s and Bourn’s career production provides additional impetus for this panel to reach that same conclusion. As the chart demonstrates with the bolded figures, Fowler bested Bourn in 11 out of the 12 career performance categories. Particularly as his career OBP bests Bourn by 33 points and his OPS surpasses Bourns by 112 points, Fowler proves the more powerful, more consistent run producer as well as the more elite overall hitter. The only logical conclusion from this comparison points to a salary for Fowler considerably greater than Bourn’s $4.4M. As Bourn’s salary figure effectively represents the midpoint in this case, this panel must award Fowler his requested $4.6M.

**CONCLUSION:**

The statistics, salaries, and attributes of well-rounded contributors and catalytic hitters indicate that such players remain valuable commodities with appropriately high salaries. That Dexter Fowler ranked among such players in total production and overall performance indicates that Mr. Fowler should be recognized with a similarly high salary. His raise of $1.926M, earned following his first year of arbitration eligibility, established a baseline for the raise that he should receive for the 2013 season and essentially represents the midpoint raise in this hearing. Since Fowler set career highs in H’s, HR’s, RBI’s, AVG, OBP, SLG, OPS, significantly outpaced or closely approached his pre-2012 seasonal averages in each key hitting category, and joined the ranks of elite OF’s in AVG and OBP, Fowler should earn a raise in 2013 that exceeds his previous season’s raise. As such an increase would bring him above the midpoint of this case,
this panel must award Fowler his requested $4.6M. Moreover, as Fowler clearly outperformed similarly situated players such as Martin Prado and Michael Bourn in platform season and career production, Fowler should be similarly compensated with a salary that at least approaches Prado’s $4.75M 2012 salary and eclipses Bourn’s. Since Fowler matched or bested Prado in all 12 of the key hitting categories during their respective platform seasons and similarly approached or surpassed Prado in career-to-date totals, Fowler’s $4.6M request proves both reasonable and fair. Bourn’s $4.4M 2011 salary that represents a $2.0M increase from his 2010 season falls just slightly above both the salary midpoint and raise midpoint in this instant case. That Fowler significantly surpassed Bourn in H’s, 3B’s, HR’s, RBI’s, BB’s, AVG, OBP, SLG, OPS in both platform season and career production indicates that Fowler should be paid substantially more than Bourn and closer to Prado’s salary. Since Mr. Fowler need only prove that he matched Bourn’s output in order to receive the requested salary in this case, Mr. Fowler respectfully asks that this panel recognize him as a well-rounded contributor and catalytic elite outfielder and award him $4.6M for the upcoming season.