2013 National Baseball Arbitration Competition

**Dexter Fowler v. Colorado Rockies**

*Submission on Behalf of Colorado Rockies*

*Midpoint: $4.3 million*

*Submission by: Team 11*
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I. Introduction and Request for Hearing Decision

This brief analyzes the relevant performance and factors allowed by the Major League Baseball Collective Bargaining Agreement (CBA) to determine the salary arbitration between Major League Baseball’s Colorado Rockies franchise (Rockies or Club) and their second-year arbitration eligible player, Dexter Fowler (Fowler). The CBA is an agreement between the Major League Baseball Players Association and the thirty Major League Baseball (MLB) clubs. The CBA permits arbitrators to consider the following criteria in making its decision: 1) the quality of the player’s contribution during the past season; 2) the length and consistency of the player’s career contributions; 3) the player’s past compensation; 4) the salaries of comparative players; 5) the existence of a player’s physical or mental defects; and 6) the recent performance of the club. Neither party may offer the financial position of the party, press comments or testimonials (except annual Player awards), prior salary offers, the costs of representation, or salaries in other sports or occupations as evidence.

Over the 2009-2012 MLB seasons, Fowler has accrued 3.168 years of major league service time (MLST), making him eligible for salary arbitration for the second time after bypassing “Super-Two” arbitration in 2012 and signing a one-year $2,350,000 contract. Fowler seeks $4.6 million as compensation for the 2013 season. The Rockies offer $4 million as fair and reasonable compensation. The arbitrator must pick one of these figures. The mid-point of these two offers is $4.3 million. Therefore, if the panel believes Fowler’s fair market value is $4,299,999 or lower, the panel should find in the Rockies’ favor.

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2 Id. art.VI(E) § (10)(a). pp. 20-21.
3 Id. art. VI(E) § (10)(b). p. 21.
4 Under the CBA, 172 days is equivalent to 1 year. Id. art. XXI(A) § (1). p. 96.
6 CBA, art. IV(E) § (1)(a). pp 17-18.
7 Id. art. IV(E) § (13). p. 22.
Fowler’s statistical contributions throughout his career, as compared with other outfielders with similar statistical production and service time, show that he is not worth more than the $4.3 million mid-point. Therefore the proper conclusion is that $4 million is fair and reasonable compensation. Accordingly, it is requested the arbitration panel find in the Rockies’ favor.

II. Quality of the Player’s Contributions During the Past Season

The Rockies entered the 2012 season hoping that, for the third straight season, Fowler’s progression as a player would solidify him as the team’s everyday centerfielder. Fowler set career highs in batting average (AVG), on-base percentage (OBP), slugging percentage (SLG), and total games played.\(^8\) He became a defensive liability, however, as he was statistically the worst everyday centerfielder in the National League (NL), leading the league in errors and posting the worst fielding percentage among qualifying NL centerfielders.\(^9\) Further, Fowler missed fourteen games while on the disabled list (DL) in addition to being limited to pinch hitting for five games due to an ankle injury the last week of August. Moreover, Fowler was unable to hit for five games (thus only able to play defense) due to a wrist injury the final week of the season.\(^10\)

Fowler’s defensive shortcomings are exposed in both traditional and sabermetric data. Measurements of Fowler’s skill set in the field including range, arm, and plays made equate to Fowler having cost the Rockies approximately fourteen runs during the 2012 season.\(^11\) Fowler

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\(^8\) Baseball-reference, supra note 5.


was the only NL centerfielder to have an ultimate zone rating (UZR\textsuperscript{12}) in negative double digits, the worst of any centerfielder that played at least one third of an inning in the NL.\textsuperscript{13}

Fowler’s injuries and defensive deficiencies also severely limited Fowler’s offensive opportunities. Although appearing in a career high 143 games, Fowler only completed 109 games without having to be removed because of injury or defensive concerns.\textsuperscript{14} This resulted in Fowler having the fewest plate appearances of all qualifying NL centerfielders.\textsuperscript{15} Further, Fowler’s career high in games played is diminished when taking into account that it was still the third fewest games among qualifying NL centerfielders. The only centerfielders that played fewer games were Bryce Harper, who was not called up until late April, and Drew Stubbs, who spent 17 games on the disabled list.\textsuperscript{16}

Fowler also continued a downward trend in contract rate in 2012. In each of the past two seasons, Fowler has posted a higher strikeout rate than the season before. His 24.2 percent strikeout rate was the second highest among qualified centerfielders in 2012.\textsuperscript{17} In light of his alarmingly high strikeout rate with a batting average on balls in play that was 37 points above his career average,\textsuperscript{18} Fowler’s career-high batting average must be put in proper perspective. Additionally, when Fowler was able to reach base he posted a career-low 12 stolen bases,\textsuperscript{19} which ranked him second-to-last among qualified NL centerfielders.\textsuperscript{20}

\textsuperscript{12} For explanation of UZR see note 11.
\textsuperscript{14} Baseball-reference, supra at note 9.
\textsuperscript{15} Id.
\textsuperscript{17} Fangraphs, supra at note 13.
\textsuperscript{18} Fangraphs, supra at note 11.
\textsuperscript{19} Baseball-reference, supra at note 9.
\textsuperscript{20} Fangraphs, supra at note 13.
III. Length and Consistency of Career Contributions

Fowler made his MLB debut September 2, 2008 as a September call-up at the end of the season. Since the 2009 season the Rockies have looked to Fowler to be their everyday centerfielder. Fowler spent the majority of the 2009 season with the Rockies producing decent offensive numbers, showing potential to steal bases, but playing subpar defense. In each of the 2010 and 2011 seasons Fowler spent a month of the season in the minor leagues. He put up similar offensive numbers while with the Rockies, with fewer steals, but marginally improved defense.\(^{21}\) The Rockies signed Fowler to a one-year contract after 2011 hoping that he would continue his progression. However, while putting up career numbers offensively in 2012, Fowler’s defense regressed to the performance level of his rookie season. Due to his poor defense, Fowler’s offensive opportunities were limited as he finished thirty-four fewer games than he appeared in, resulting in a career high in games played in 2012, but 33 fewer plate appearances than in 2011.

<table>
<thead>
<tr>
<th>Year</th>
<th>G</th>
<th>Games Finished(^{23})</th>
<th>Plate Appearances</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>SB/CS</th>
<th>E</th>
<th>UZR</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>135</td>
<td>101</td>
<td>518</td>
<td>.266</td>
<td>.363</td>
<td>.406</td>
<td>27/10</td>
<td>4</td>
<td>-16.2</td>
</tr>
<tr>
<td>2010</td>
<td>132</td>
<td>99</td>
<td>505</td>
<td>.260</td>
<td>.347</td>
<td>.410</td>
<td>13/8</td>
<td>1</td>
<td>-3.5</td>
</tr>
<tr>
<td>2011</td>
<td>125</td>
<td>118</td>
<td>563</td>
<td>.266</td>
<td>.363</td>
<td>.432</td>
<td>12/9</td>
<td>8</td>
<td>-5.8</td>
</tr>
<tr>
<td>2012</td>
<td>143</td>
<td>109</td>
<td>530</td>
<td>.300</td>
<td>.389</td>
<td>.474</td>
<td>12/5</td>
<td>6</td>
<td>-13.9</td>
</tr>
</tbody>
</table>

IV. Player’s Past Compensation

The Rockies drafted Fowler with the 410th pick in the fourteenth round of the 2004 first year player draft.\(^{24}\) Fowler received a fourteenth round record $925,000 signing bonus.\(^{25}\) In September 2008 Fowler’s contract was purchased from the minor leagues and he received a

\(^{21}\) 2010 and 2011 Dexter Fowler Game Log, ESPN.com, http://espn.go.com/mlb/player/gamelog/_/id/29252/year/2010/dexter-fowler (Fowler was in AAA for twenty-seven games in June of 2010 and twenty-four over June and July of 2011.).

\(^{22}\) Baseball-reference, supra at note 9.

\(^{23}\) Id.


\(^{25}\) Id.
prorated portion of $390,000 applicable league minimum for 2008.26 For the 2009, 2010, and 2011 seasons Fowler was paid above league minimum receiving $401,000, $406,000, and $424,000 respectively.27 After filing for arbitration prior to the 2012 season, he reached an agreement with the Rockies for a one year $2.35 million contract.28

V. Comparable Baseball Salaries

A. Angel Pagan (1 year/$3.5 million)29

On a career and platform season basis, the one-year $3.5 million dollar salary of outfielder Angel Pagan in 2011 is an apt comparison. This analysis places Fowler’s value closer to $4 million per season. After four seasons of Major League service, Fowler has accumulated a larger body of work than Pagan with substantially more games played and plate appearances.

| Table 2: Career-to-Platform Statistical Comparison of Dexter Fowler30 and Angel Pagan31 |
|--------------------------------------|----------------|----------------|----------------|--------------|--------------|--------------|----------------|---------------|
|                                      | Games | Runs | RBI  | HR  | AVG | OBP | SB  | SLG | WAR            |
| Fowler                               | 548   | 305  | 168  | 28  | .271| .364| 64  | .427| 7.5           |

However, Fowler and Pagan’s career-to-platform numbers are very similar in many respects. Although he played in 130 fewer games, Pagan posted nearly as many runs batted in, home runs, and stolen bases as Fowler. Additionally, Pagan has edged Fowler in both batting average and slugging percentage over the course of their respective careers. Pagan’s substantial margin in Wins Above Replacement can be attributed to his strong defensive metrics.33 While

26 2007-2011 CBA art. VI (B)(1).
28 Baseball Prospectus, supra at note 24.
30 Fangraphs, supra at note 11.
32 WAR is an acronym for Wins Above Replacement. According to Fangraphs.com, Wins Above Replacement is a calculation of a player’s contribution to a team by combining offensive, defensive and baserunning value. For purposes of this analysis, the WAR numbers used are from Fangraphs.com.
33 Fangraphs, supra at note 31, see also Dexter Fowler Player Page, Fangraphs, http://www.fangraphs.com/statss.aspx?playerid=4062&position=OF.)According to Fangraphs’s measurements,
advanced defensive metrics are evolving statistical measures, many reputable Web sites including ESPN and Baseball-reference use the data to calculate Wins Above Replacement.

Pagan did not earn every day playing time until his platform season in 2010. Conversely, Fowler’s platform season was his fourth as the Rockies’ centerfielder. Thus, comparing platform seasons will be helpful in establishing Fowler’s value for next season.

| Table 3: Platform Season Statistical Comparison of Dexter Fowler and Angel Pagan |
|-------------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
|                  | Games | Runs  | RBI   | HR    | AVG   | OBP   | BABIP | SB     | SLG    | WAR    |
| Fowler           | 143   | 72    | 53    | 13    | .300  | .389  | .390  | 12     | .474   | 2.9    |
| Pagan            | 151   | 80    | 69    | 11    | .290  | .340  | .331  | 37     | .425   | 5.4    |

In their platform seasons, Fowler and Pagan posted similar numbers across the board. Fowler holds advantages in batting average and on-base percentage. This, however, can be attributed to the aforementioned 37-point spike in Fowler’s batting average on balls in play. In run producing categories, Pagan was significantly more prolific with eight more runs scored and 16 more runs batted in. Additionally, Pagan was both a more efficient and frequent base stealer than Fowler in their platform seasons with 25 more steals and a ten-percent advantage in stolen base rate. Given the similar performances in platform seasons and career contributions, Fowler’s value is comparable to the one-year $3.5 million contract Pagan received in 2011.

B. B.J. Upton (1 year/$4.825 million)

B.J. Upton is an example of a player more deserving of Fowler’s desired $4.6 million salary. In contrast to Pagan, Upton was installed as the Rays’ starting centerfielder in 2007 and has a similar career arc to Fowler. After his fourth season as a starter, Upton signed a one-year, $4.825 million contract with the Rays. While Fowler has established himself as a viable Major League centerfielder, he has yet to achieve Upton’s post-2010 value.

Pagan was worth an additional 27.1 runs in the field from 2006-10. In contrast, Fowler was -39.1 runs below average in the field from 2009-12)

34 Fowler stole bases at a 70.4 percent rate in 2012 compared to the 80.4 percent rate by Pagan.
In traditional measurements, Upton’s first four Major League seasons exceed Fowler’s. While Fowler has provided marginally higher numbers in batting average, on-base percentage and slugging percentage, the overwhelming statistical advantage is in Upton’s favor. Upton scored over nine more runs per year, drove in almost 25 more runs per year and displayed a much larger knack for the long ball. During their first full Major League seasons, Fowler tallied five more stolen bases than Upton, 27 to 22. However, during the next three comparable years Upton showed remarkable consistency with over 40 stolen bases in each year. Fowler failed to steal 40 total bases during the same stretch.

| Table 4: First Four Major League Seasons Comparison for Dexter Fowler and B.J. Upton |
|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|
|                | Games | Runs | RBI | HR  | AVG | OBP | SLG | SB  | WAR |        |
| Fowler         | 535   | 302  | 168 | 28  | .273| .366| .431| 64  | 7.8  |        |
| Upton          | 572   | 339  | 266 | 62  | .261| .350| .424| 150 | 15.9 |        |

Additionally, Upton’s sabermetric value was one of the highest in the game for outfielders. From 2007-10, Upton ranked ninth among all Major League outfielders with 15.9 wins above replacement. Conversely, Fowler ranked 53rd among all Major League outfielders from 2009-12 with 7.8 wins above replacement. Thus, Fowler’s value is substantially less than Upton’s after his 2010 season and a salary below the $4.3 million midpoint for Fowler is more deserving.

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36 Id., see Table 1.
37 Baseball-reference, supra at note 36.
38 Statistics reflect 2007-2010 for Upton and 2009-2012 for Fowler. All prior Major League experience has been excluded from the career numbers to reflect a four-year comparison.
40 WAR is from Fangraphs.
C. Michael Cuddyer (1 year/$3.575 million in 2007)\textsuperscript{43}

A comparison of Fowler to Michael Cuddyer through career statistics and platform seasons establishes that Fowler’s value is in the $4 million range. After the 2006 season, Cuddyer underwent arbitration for the second straight season but instead signed a one-year $3.575 million contract for 2007. Although 2006 was Cuddyer’s third full season in the Major Leagues, he had accumulated four seasons of service time.


<table>
<thead>
<tr>
<th>Table 5: Career-to-Platform Statistical Comparison for Dexter Fowler and Michael Cuddyer\textsuperscript{44}</th>
</tr>
</thead>
<tbody>
<tr>
<td>Games</td>
</tr>
<tr>
<td>Fowler</td>
</tr>
<tr>
<td>Cuddyer</td>
</tr>
</tbody>
</table>

On a career-to-platform basis, Fowler and Cuddyer are very similar players. Fowler’s decisive edge in runs is explained by the fact that in 314 of his 548 games Fowler batted in the first or second spot in the lineup. In contrast, the majority of Cuddyer’s at bats came in the fifth through ninth spot in the order.\textsuperscript{45}


<table>
<thead>
<tr>
<th>Table 6: Platform Season Statistical Comparison for Dexter Fowler and Michael Cuddyer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Games</td>
</tr>
<tr>
<td>Fowler</td>
</tr>
<tr>
<td>Cuddyer</td>
</tr>
</tbody>
</table>

Cuddyer’s platform season was statistically superior to Fowler’s for a number of reasons. First, Cuddyer’s offensive numbers drastically outperformed Fowler’s with 30 more runs and over double the runs batted in. Secondly, Fowler’s performance was buoyed by abnormally high home splits. In Coors Field, Fowler’s slash line was .332/.431/.553 compared to .262/.339/.381 on the road.\textsuperscript{46} Cuddyer, however, was a much more complete player with a home split of

\textsuperscript{45} In 2004, only 41 of his 339 at bats were in the 1-4 slots. In 2005, 347 of his 422 at bats came in the 7\textsuperscript{th} or 8\textsuperscript{th} slot. In 2006, all but two of his 557 at bats were in the 4-9 slots.
.302/.371/.559 and a road split of .264/.353/.449.\(^{47}\) Lastly, with runners in scoring position, Cuddyer batted .313 with an excellent .992 OPS compared to a .298 average and .877 OPS for Fowler.\(^{48}\)

Adjusting for inflation, Cuddyer’s $3.575 million salary in 2007 equates to $4.07 million in 2012.\(^{49}\) Given the numerous similarities between Fowler and Cuddyer, it is reasonable to place Fowler’s 2013 value under the $4.3 million midpoint.

VI. Existence of Physical or Mental Defects

As discussed in previous sections, Fowler has demonstrated a physical deficiency as a defensive centerfielder. Further, minor injuries have limited Fowler’s availability each season. In 2012, Fowler missed fourteen games while on the DL.\(^{50}\) He missed the same number of games in 2011.\(^{51}\) In 2009, Fowler missed seventeen games.\(^{52}\) Only the 2010 season saw Fowler not miss significant playing time due to injury.

In addition to his fielding and nagging injuries, Fowler’s 2012 season showed a defect in performing away from the forgiving Coors Field atmosphere. While Fowler is not the first player to have his power number aided by the thin Denver air, the large discrepancies in his home and road AVG, BB, and K% are cause for concern as the air should not affect his ability to recognize pitches in and out of the strike zone or make contact with them. Whether physical or mental, Fowler’s inconsistency away from home is certainly a defect in his ability.

\(^{48}\) See notes 45 and 46.
\(^{50}\) Baseball Prospectus, supra at note 24.
\(^{51}\) Id.
\(^{52}\) Id.
Table 7: Fowler 2012 Home/Away Splits

<table>
<thead>
<tr>
<th></th>
<th>G</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>HR</th>
<th>RBI</th>
<th>BB</th>
<th>K (%)</th>
<th>SB/CS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Home</td>
<td>72</td>
<td>.332</td>
<td>.431</td>
<td>.553</td>
<td>10</td>
<td>39</td>
<td>43</td>
<td>61 (25%)</td>
<td>5/3</td>
</tr>
<tr>
<td>Away</td>
<td>71</td>
<td>.262</td>
<td>.339</td>
<td>.381</td>
<td>3</td>
<td>14</td>
<td>25</td>
<td>67 (32%)</td>
<td>7/2</td>
</tr>
</tbody>
</table>

VII. Recent Performance of the Club

As the Rockies have relied on Fowler to play a bigger role as their starting centerfielder, the team’s performance has declined each season. In Fowler’s first full season, 2009, the Rockies finished 92-70 winning the NL wildcard and losing in the first round of the playoffs. That season the team allowed 715 runs. Since that first season, the team’s record has progressively worsened as the runs allowed have increased with 2012 posting a 64-98 record allowing 890 runs. While Fowler is not solely responsible for the worsening record and the increase in runs allowed, as discussed above in Section II, his defensive play is a contributing factor as the Rockies search for an everyday centerfielder.

VIII. Conclusion

Over the past four seasons Fowler has failed to show he can be a consistent, everyday centerfielder at the major league level. While his offensive performance in 2012 shows potential for growth, his lower numbers on the road are more in line with his previous career numbers, suggesting Fowler’s 2012 numbers may be nothing more than a temporary boost from playing at the higher altitude of Coors Field. Further, Fowler’s inability to play consistent major league level defense limits any benefit he may offer offensively as he must be substituted for defensive purposes. Additionally, Fowler and is continually hampered by nagging injuries. Based on the evidence provided in this brief and in oral argument, the Rockies respectfully request the arbitration panel find the offer of $4 million to be an appropriate salary for Fowler in 2013.

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53 Baseball-reference.com - Fowler
55 Id.
56 Id.