2013 National Baseball Arbitration Competition

Dexter Fowler v. Colorado Rockies (MLB)

SUBMISSION ON BEHALF OF: Dexter Fowler
Club Offer: $4.0 million
Midpoint: $4.3 million
Player Request: $4.6 million

Submission by: Team 32
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Rockies Review, Google Inc., www.rockiesreview.com
I. **INTRODUCTION AND REQUEST FOR HEARING DECISION**

This brief analyzes the assets and contributions of switch-hitting center fielder William Dexter Fowler (“Dexter”) to be reflected in his 2013 contract with the Colorado Rockies Baseball Club (“Rockies”). The Major League Baseball (“MLB”) Collective Bargaining Agreement (“CBA”) has determined the criteria to be considered in this arbitration hearing.\(^1\) Criteria include: quality of contributions to the club during the past season, career contributions, past compensation, comparative baseball salaries, physical or mental defects, and recent club performance.\(^2\)

Through the end of the 2012 season, Dexter has reached 4.168 years of MLB service and is arbitration eligible for a second time this offseason.\(^3\) The analysis of his past performance and value to the club presented in this brief and through oral argument demonstrates that Dexter is fairly entitled to a salary exceeding the $4.3 million midpoint between his final offer of $4.6 million and the $4.0 million offered by the Rockies. Mr. Fowler respectfully requests that the arbitration panel find him entitled to a 2013 salary of $4.6 million.

II. **QUALITY OF FOWLER’S CONTRIBUTIONS TO THE ROCKIES IN 2012**

Dexter’s platform season was his best as a major leaguer, highlighted by the best game of his career on May 28\(^{th}\) where he went 4-4 with a walk-off triple against the Astros.\(^4\) He led the Rockies with 11 triples; 5\(^{th}\) best in the National League.\(^5\) Dexter also led the Rockies with an on-base percentage (“OBP”) of .389, which was 7\(^{th}\) in the NL and

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2. *Id.* at §12(a)
4th amongst qualifying MLB outfielders. Dexter hit for average and power throughout the 2012 season finishing with career highs in batting average (“AVG”) (.300), hits (136), HRs (13), RBIs (53), slugging percentage (“SLG”) (.474), and on base plus slugging (“OPS”) (.863). Dexter’s 2012 OPS of .863 was 21st in the MLB and 9th amongst qualifying MLB outfielders.

<table>
<thead>
<tr>
<th>TABLE 1: DEXTER FOWLER OFFENSIVE PRODUCTION 2012</th>
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<tbody>
<tr>
<td>Games</td>
</tr>
<tr>
<td>-------</td>
</tr>
<tr>
<td>143</td>
</tr>
</tbody>
</table>

In 2012, Dexter showed his efficiency and versatility as a switch hitter, against both left handed and right handed pitchers. He batted no lower than .293 and had an OBP of at least .385 on either side of the plate. He’s exceptional from both sides of the plate adding to his value as a top of the lineup hitter. Dexter hit well over .300 against lefties and effectively hit for power against righties.

<table>
<thead>
<tr>
<th>TABLE 2: DEXTER FOWLER 2012 SWITCH HITTING SPLITS</th>
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<tbody>
<tr>
<td>Split</td>
</tr>
<tr>
<td>---------------------------------------------</td>
</tr>
<tr>
<td>vs. LH Starter</td>
</tr>
<tr>
<td>vs. RH Starter</td>
</tr>
</tbody>
</table>

Furthermore, in 2012, Dexter led the MLB with a .390 “Batting Average on Balls In Play” (BABIP). BABIP measures how many of a batter’s balls put in play go for hits, showing Dexter is one of the better contact hitters in all of baseball. This is an

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6 Id.
7 Id.
9 Baseball Reference, supra Note 3.
11 Id.
important statistic because every ball that is put in play for a hit is considered a productive at-bat; therefore he adds value as a top of the line-up batter.

III. LENGTH AND CONSISTENCY OF FOWLER’S CAREER CONTRIBUTIONS

Dexter was drafted by the Rockies in the 14th Round of the 2004 MLB Amateur Draft. He spent the first three years of his career in the Rockies minor league system after rejecting offers to play for Harvard University, and the University of Miami. After a dominant performance in Double-A, Dexter was selected to represent the United States in the 2008 Summer Olympics in Beijing. While there, he helped Team USA earn a bronze medal defeating Japan 8-4.

Upon his return from Beijing, the Rockies brought Dexter up to the major league club in September 2008. In 2009, his first full season in the major leagues, Fowler was 6th in the NL with 27 stolen bases and hit 10 triples, the 5th most in the NL. He was only in the majors for 16 days before he set his first Major League record by becoming the first rookie to steal five bases in one game against the San Diego Padres. Additionally, he finished 8th in Rookie of the Year voting behind the likes of Tommy Hanson and Andrew McCutchen. The following chart illustrates Dexter’s career contributions.

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17 Baseball Reference, supra Note 3.
18 Id.
In the first four seasons of Dexter’s career, he has produced consistently year-to-year. Playing in over 125 games each of the last four years, Dexter has also annually scored at least 70 runs, hit at least 10 triples, and had an OBP of at least .345.\footnote{21} Dexter led the MLB with 14 triples in 2010 and has finished top five in triples hit in each season of his career.\footnote{22} While his stolen base numbers have diminished slightly, Dexter’s figures for RBIs, SLG, and OPS have all steadily increased throughout his career.\footnote{23}

IV. **Comparative Baseball Salaries**

Dexter’s career and platform season statistics are impressive, however, the comparisons to similar players provide the most compelling evidence that Dexter’s offer of $4.6 million accurately reflects his value and contribution to the Rockies. For the purposes of establishing Dexter’s value, it is useful to compare his career and platform season statistics with those of Michael Bourn, B.J. Upton, and Martín Prado.

\textit{a. Michael Bourn ($4.4 million in 2011)}

Comparing Dexter to centerfielder Michael Bourn demonstrates that Dexter’s value to the Colorado Rockies is greater than the $4.3 million midpoint. Bourn received a raise of $2.0 million and was awarded $4.4 million in 2011 for his 2010 performance, greater than the $4.3 million midpoint. The same $2.0 million pay raise for Dexter would indicate his value is at least $4.3 million. Dexter produced better platform season

\begin{table}[h]
\centering
\begin{tabular}{|c|c|c|c|c|c|c|c|c|c|c|}
\hline
\textbf{YEAR} & \textbf{GAMES} & \textbf{RUNS} & \textbf{HITS} & \textbf{3B} & \textbf{HR} & \textbf{RBI} & \textbf{SB/CS} & \textbf{BB} & \textbf{AVG} & \textbf{OBP} & \textbf{SLG} & \textbf{OPS} \\
\hline
2008 & 13 & 3 & 4 & 0 & 0 & 0 & 0/1 & 0 & .154 & .185 & .154 & .339 \\
2011 & 125 & 84 & 128 & 15 & 5 & 45 & 12/9 & 68 & .266 & .363 & .432 & .796 \\
\textbf{TOTAL} & \textbf{548} & \textbf{305} & \textbf{497} & \textbf{50} & \textbf{28} & \textbf{168} & \textbf{64/32} & \textbf{260} & \textbf{.271} & \textbf{.364} & \textbf{.427} & \textbf{.791} \\
\hline
\end{tabular}
\caption{Dexter Fowler Career Offensive Production\footnote{20}}
\end{table}

\footnotesize

\begin{flushleft}
\textsuperscript{20} Baseball Reference, \textit{supra} Note 3. \\
\textsuperscript{21} \textit{Id.} \\
\textsuperscript{22} \textit{Id.} \\
\textsuperscript{23} \textit{Id.}
\end{flushleft}
numbers and slightly better career numbers than Bourn. Therefore, Dexter’s value should be on par with Bourn’s awarded salary in 2011.

<table>
<thead>
<tr>
<th>Player</th>
<th>Year</th>
<th>Games</th>
<th>Runs</th>
<th>Hits</th>
<th>3B</th>
<th>HR</th>
<th>RBI</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
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<tr>
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<td>136</td>
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<td>53</td>
<td>.300</td>
<td>.389</td>
<td>.474</td>
<td>.863</td>
</tr>
<tr>
<td>Bourn</td>
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<td>141</td>
<td>84</td>
<td>142</td>
<td>6</td>
<td>2</td>
<td>38</td>
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<td>168</td>
<td>.271</td>
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<td>Bourn</td>
<td></td>
<td>558</td>
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<td>456</td>
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<td>108</td>
<td>.263</td>
<td>.331</td>
<td>.348</td>
<td>.629</td>
</tr>
</tbody>
</table>

*Numbers adjusted to reflect career statistics at the point of arbitration

Table 4: Dexter Fowler and Michael Bourn Comparable Statistics (Platform & Career)

Heading into arbitration, Dexter’s career has been more productive offensively than Mr. Bourn’s even though he played in 10 fewer games (548 to 558). While Mr. Bourn was more productive in the field and had stolen more bases; Dexter scored more runs, had more hits, hit twice as many triples, almost three times as many HRs, and had 60 more RBIs. Also, as demonstrated by the table above, Dexter’s career averages for AVG, OBP, SLG, and OPS are substantially higher than Mr. Bourn’s.

The career paths of Mr. Bourn and Mr. Fowler are substantially similar. Then both players spent time developing in the minor league system, while Dexter was brought up at an earlier point in his career. Mr. Bourn was second-time arbitration eligible at the age of 28 when he was awarded a $4.4 million salary; Dexter, who is currently second time eligible, will be 26 years old, at the start of the 2013 season. Furthermore, while both players are young, they both have postseason experience. Dexter got his first taste of October baseball in 2009 when the Rockies lost to the Philadelphia Phillies in the NL Division Series. Mr. Bourn had one at bat in two games in the 2007 NL Division Series against the Phillies. Dexter’s career numbers and intangibles should show a valuation on at the very least on par with the salary awarded to Mr. Bourn.

24 Id.; Baseball Reference, supra Note 3.
25 Baseball Reference, supra Note 23.
26 Id.
Dexter substantially outperformed Mr. Bourn in their respective platform seasons as well. As shown in the table above, in 2012, Dexter hit for both average and power more effectively than Bourn did in 2010. While Bourn stole more bases, scored 12 more runs (84 to 72), and had a few more hits (142 to 136); Dexter hit more triples (11 to 6) and HRs (13 to 2), had more RBIs, and had significantly higher averages across the board. Dexter has produced significantly better offensive numbers in his platform season than did Bourn and has better career offensive statistics. Since Bourn’s salary exceeds the $4.3 million midpoint, Dexter’s salary should also.

b. B.J. Upton ($4.825 million in 2011)

Centerfielder B.J. Upton, who has played over 100 more games than Dexter, does not provide as close of a match as does Mr. Bourn, but the comparison still establishes Dexter’s value as above the $4.3 million midpoint. Mr. Upton received a salary of $4.825 million in 2011 for his performance in 2010, greater than both Dexter’s offer of $4.6 million and the $4.3 million midpoint.\(^27\) Mr. Upton’s career totals are indicative of the fact that he has played in substantially more games. However, Dexter’s career averages are exceed Upton’s in every respect. Dexter was more productive than Mr. Upton during their platform seasons as well. Mr. Upton received a $1.825 million raise for his performance in 2010. While a $1.825 million raise would not put Dexter over the midpoint, the critical value of his platform numbers and his greater career percentages should push Dexter’s value above the midpoint.

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While Upton had played in over 100 more games (667 to 548) and had more runs, hits, home runs, and RBIs than Dexter at the time of arbitration, Dexter’s career percentages are superior to Upton’s. As shown in the table above, Dexter has a higher AVG, OBP, SLG, and an OPS more than .030 higher than Upton’s (.791 to .758). Upton had stolen over 100 more bases than Dexter at the point of arbitration (165 to 64), however Mr. Upton had twice as many stolen base attempts.\(^{29}\) This accurately reflects the philosophy of the players respective clubs and managers more so than Dexter’s ability to steal bases. Upton has significant issues with striking out, being among the active player leaders in that category.\(^{30}\) Upton’s strike out to walk ratio of 2.20 is significantly higher than Dexter’s 1.86.

Dexter also outperformed Upton in their platform seasons. As shown in the table above, his offensive numbers in 2012 were superior to Mr. Upton’s in 2010. Mr. Upton scored 17 more runs in his platform season than did Dexter, hit 5 more HRs, and had 9 more RBIs. However, in every other statistical category, Dexter outperformed Mr. Upton. Although Mr. Upton played in 11 more games Dexter in their platform years, Dexter had more hits and almost three times as many triples. Dexter’s 2012 percentages were far superior to Mr. Upton’s in 2010. Dexter’s AVG (.300 to .237) and OBP (.389 to .322)

\(^{28}\) Id.; Baseball Reference, supra Note 3.

\(^{29}\) Id.

were both over a half a point higher than Mr. Upton’s. Dexter’s SLG (.474 to .372) and
OPS (.863 to .694) were over an astounding full point higher than Mr. Upton’s. In the
field, Mr. Fowler’s six errors are right on par with Mr. Upton’s five.

The preceding statistical comparison between Dexter and Mr. Upton indicate that
Dexter is entitled to a salary above the $4.3 million midpoint. Dexter produced better
platform numbers and has produced better career percentages than Mr. Upton. Mr.
Upton’s salary exceeds the $4.3 million midpoint, and therefore Mr. Fowler’s salary
should also.

c.  
*Martin Prado (§4.75 million in 2011)*  
Comparing Dexter Fowler to Martin Prado also places Dexter’s value above the
§4.3 million midpoint. This comparison is helpful because Prado regressed in his 2012
platform year, while Dexter continued his progression in 2012. Regardless, Prado was
awarded a salary of §4.75 million.31 Dexter’s platform year performance was superior to
Prado’s 2011 while their career offensive numbers are substantially similar. Therefore,
Dexter’s 2013 value should be on par with the salary Prado received in 2012.

<table>
<thead>
<tr>
<th>Player</th>
<th>Year</th>
<th>Games</th>
<th>Runs</th>
<th>Hits</th>
<th>3B</th>
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<tbody>
<tr>
<td>Fowler</td>
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<td>13</td>
<td>53</td>
<td>.300</td>
<td>.389</td>
<td>.474</td>
<td>.863</td>
</tr>
<tr>
<td>Prado</td>
<td>2011</td>
<td>129</td>
<td>66</td>
<td>143</td>
<td>2</td>
<td>13</td>
<td>57</td>
<td>.260</td>
<td>.302</td>
<td>.385</td>
<td>.687</td>
</tr>
<tr>
<td>Career Totals* (Martin Prado 2012 Salary: §4.75 Million)</td>
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<td></td>
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<tr>
<td>Fowler</td>
<td>548</td>
<td>305</td>
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<tr>
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<td>42</td>
<td>216</td>
<td>293</td>
<td>.341</td>
<td>.434</td>
<td>.775</td>
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</table>

*Numbers adjusted to reflect career statistics at the point of arbitration

Prado’s career differs from Dexter’s because only recently Prado became an
everyday outfielder, making this an imperfect comparison. However, the comparison still
values Dexter above the midpoint. Mr. Prado, at the time of arbitration, had more hits,
HRs, RBIs, a higher AVG, and a higher SLG. However, Dexter has scored more runs, hit

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32 Id.
five times as many triples, has a higher OPS, and an OBP more than .020 higher than Mr. Prado. Dexter has also walked a significant amount more than Mr. Prado (260 to 139), again showcasing his ability to get on base and produce runs.\footnote{Id.}

Dexter significantly outperformed Mr. Prado in their platform seasons. Differences in their respective numbers for hits as well as HRs and RBIs are negligible. However, as shown in the table above, Dexter’s 2012 numbers in every other statistical category were far superior to Prado’s in 2011.

Furthermore, Mr. Fowler has postseason experience whereas Mr. Prado, at the time of arbitration, has never played in a postseason game. In Prado’s 2011 platform year and the season before, he showed a tendency to be injury prone, missing more than a month each season.\footnote{Atlanta Journal-Constitution, Prado On DL For Staph Infection, available at http://blogs.ajc.com/atlanta-braves-blog/2011/06/10/prado-on-dl-for-staph-infection-of-calf/; Martin Prado Done For Season With Hip Pointer and Torn Oblique, NBC Sports, available at http://hardballtalk.nbcsports.com/2010/09/28/martin-prado-done-for-season-with-hip-pointer-and-torn-oblique/} On the other hand, Dexter has never a significant amount of games. Nevertheless, Prado was awarded a salary above the $4.3 million midpoint in this case. Dexter’s superior play in his platform season and career trends, in comparison to Prado’s, shows his value to be above the $4.3 million midpoint.

V. **PAST COMPENSATION**

Despite being one of the stronger contributors to the Rockies, Dexter earned close to the league minimum each year up until his previous salary negotiated in the context of arbitration eligibility in 2011. He earned $2.35 million in 2012.

VI. **EXISTENCE OF PHYSICAL OR MENTAL DEFECTS**

Dexter Fowler has been healthy for most of his career, suffering two minor injuries during his platform season. Dexter missed a few games in August 2012 due to a
tweaked right ankle. He was also shut down for the season on September 22, 2012 with the Rockies out of the playoff hunt because of a sprained left wrist.\footnote{Denver Post, Dexter Fowler Avoids Break, But Ankle Injury Will Sideline Him, available at http://blogs.denverpost.com/rockies/2012/08/22/dexter-fowler-avoids-break-ankle-days/12758/; Dexter Fowler Unlikely To Play Again This Season Due To Wrist Injury, NBC Sports, available at http://hardballtalk.nbcsports.com/2012/09/27/dexter-fowler-unlikely-to-play-again-this-season-due-to-wrist-injury/} He currently has no physical or mental defects and is entering the 2013 season injury free.

VII. RECENT PERFORMANCE OF THE COLORADO ROCKIES

In 2012, despite the Rockies last place finish in the NL West, Dexter’s performance has served as an offensive mainstay in a Colorado Rockies lineup that was one of the best in baseball by putting up strong numbers. Unfortunately the pitching staff has been unable to perform to the level expected, giving up a league worst 5.22 ERA.\footnote{Baseball Reference, 2012 Colorado Rockies Team Page, available at http://www.baseball-reference.com/teams/COL/2012.shtml}

VIII. CONCLUSION

Dexter Fowler has steadily improved throughout his career, without any serious injury concerns, and had a phenomenal platform season, being a key piece in the strong Rockies offense. Comparing Dexter to similar players clearly demonstrates his value exceeds the $4.3 million midpoint. Dexter had a better platform season, and had better career numbers than Michael Bourn who signed a contract of $4.4 million. Dexter’s outperformed B.J. Upton and Martin Prado in their platform seasons and had higher career averages. Both Upton and Prado earned arbitration-eligible contracts well above Dexter’s $4.6 million offer. This clearly places Dexter’s value above the $4.3 million midpoint. For all of the forgoing reasons we ask the arbitration panel to find that Dexter Fowler is entitled to of an award of $4.6 million.