

In the Matter of Salary Arbitration Between:

Cody Franson

-AND-

The Toronto Maple Leafs

[Team 9](#)

Submission of the Toronto Maple Leafs

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Introduction and Overview

This brief contains an analysis of the performance and contributions of Cody Franson of the Toronto Maple Leafs (“the Leafs”). Cody Franson’s defensive inadequacies, offensive inconsistencies and his contribution to the team’s collapse in previous seasons are all significant concerns for the organization. The Maple Leafs submit Mr. Franson is entitled to an award below the midpoint figure and that \$2.5 million per season is an appropriate and fair sum.

Defensive liability

Mr. Franson’s defensive game has not improved since joining the Leafs. As a result, Mr. Franson has not developed into the well-rounded defenceman that the organization had envisioned. To illustrate Mr. Franson’s defensive inadequacies, it is necessary to examine his time on ice, the number of giveaways he has allowed and his plus/minus totals.

In the 2013-2014 season, Mr. Franson averaged 20:41¹ minutes of ice-time per game. His average time on ice has increased steadily mainly due to his increased presence on the power play and his seniority amongst a youthful defensive core. His average power play time on ice in 2013-2014 was 2:54² up from 2:49³ and 1:10⁴ in 2012-2013 and 2011-2012, respectively.

Mr. Franson had the third most giveaways amongst all Leaf players with 68 in 2013-2014⁵. His haphazard play with the puck coupled with his increased time on ice makes Mr.

¹<http://www.nhl.com/ice/playerstats.htm?season=20132014&gameType=2&team=TOR&position=D&country=&status=&viewName=summary#>

²<http://www.nhl.com/ice/player.htm?id=8471742&view=splits>

³<http://www.nhl.com/ice/player.htm?id=8471742&view=splits&season=20122013&gameType=2>

⁴<http://www.nhl.com/ice/player.htm?id=8471742&view=splits&season=20112012&gameType=2>

⁵<http://www.nhl.com/ice/playerstats.htm?fetchKey=20142TORSASALL&sort=giveaways&viewName=rtssPlayerStats>

Franson a greater defensive liability on a team that is notorious for allowing the most shots per game in 2013-2014⁶.

Not surprisingly, Mr. Franson had a plus/minus of negative-20 in 2013-2014⁷. During that season, Mr. Franson was on the ice for 89 goals against, which amounted to the second most on the Leafs⁸. Considering the fact that the Leafs ranked 26th in goals against with 252 and 29th in short-handed goals against with 12, Mr. Franson's plus/minus figures are especially troubling⁹. Mr. Franson, after all, averaged the fifth most ice-time on the team and second highest average power play ice-time amongst the Leaf defencemen¹⁰.

These statistics reveal glaring defensive deficiencies in Mr. Franson's game and the dangers he poses to his team's chances of winning on any given night.

Offensive inconsistency

Offensive inconsistency has characterized Mr. Franson's tenure with the Leafs and his shooting percentages and monthly point totals demonstrate his overall ineffectiveness.

Presumably, he would be more effective on the power play and consistent as a point-man in general if he either took more shots or took more *accurate* shots. Mr. Franson's shot percentages in general have dropped from a peak of 7.7% in 2011-2012 when he joined the organization to 4.3% in 2013-2014¹¹. He also missed the net a total of 59 times in 2013-2014,

⁶<http://www.nhl.com/ice/teamstats.htm?fetchKey=20142ALLSAAAll&sort=avgShotsAgainstPerGame&viewName=outshootingOutshotby>

⁷<http://www.nhl.com/ice/player.htm?id=8471742&view=splits&season=20132014&gameType=2>

⁸<http://www.nhl.com/ice/playerstats.htm?fetchKey=20142TORSASALL&sort=teamGoalsAgainst&viewName=plusMinus>

⁹<http://www.nhl.com/ice/teamstats.htm?fetchKey=20142ALLSAAAll&sort=avgShotsAgainstPerGame&viewName=outshootingOutshotby>

¹⁰<http://www.nhl.com/ice/playerstats.htm?fetchKey=20142TORSASALL&sort=avgTOIPerGame&viewName=summary>

¹¹ <http://mapleleafs.nhl.com/club/player.htm?id=8471742&view=stats>

which was second most of all Leaf defencemen¹². Mr. Franson's quick release, while laudable, has not produced a significant number of power play goals even when playing with Toronto's most offensively gifted players because his accuracy is inconsistent.

Mr. Franson's 2013-2014 monthly point totals peaked in the first month of the season and then petered off heading into the Olympic break¹³. Mr. Franson's monthly point totals in the previous season resemble a set of peaks and valleys between months¹⁴. In 2011-2012, Mr. Franson registered his best point totals between December and February but did not maintain the momentum going into the final months of the season¹⁵. There is no discernible pattern to Mr. Franson's offensive production and, as such, it is difficult to predict the number of points he should be expected to record in the upcoming season.

When considered in tandem, the aforementioned statistics reveal a startling fact: Mr. Franson does not use his offensive skills to the team's advantage on a nightly basis.

Contribution to the team's collapse

Mr. Franson's increased ice-time increases his potential for costly defensive mistakes that offset his meagre offensive contributions. The net-effect of Mr. Franson's presence on the ice as measured by his plus/minus, therefore, is detrimental to his team's success.

Of the 50 games in which Mr. Franson logged over 20 minutes, he finished 21 games with a negative plus/minus compared with 13 with a positive plus/minus¹⁶. Seeing as he was negative-23 in losses during the 2013-2014 season, it is clear that Mr. Franson does not elevate

¹²<http://www.nhl.com/ice/playerstats.htm?fetchKey=20142TORSASALL&sort=missedShots&viewName=rtssPlayerStats>

¹³<http://www.nhl.com/ice/player.htm?id=8471742&view=splits&season=20132014&gameType=2>

¹⁴<http://www.nhl.com/ice/player.htm?id=8471742&view=splits&season=20122013&gameType=2>

¹⁵Ibid

¹⁶<http://www.nhl.com/ice/player.htm?id=8471742&season=20132014&view=log>

his game when his team begins to struggle¹⁷. The fact that his team is more likely to lose when Mr. Franson spends more time on the ice illustrates his ineffectiveness and his contributions to the Leafs' demise in 2013-2014. Instead of elevating his game and carrying his team, Mr. Franson scaled back his offensive production and his defensive declined.

Mr. Franson's most lacklustre performances on both ends of the ice coincide with the team's collapse in the second half of the 2013-2014 season. Mr. Franson spent the entirety of 2014 with a negative plus/minus¹⁸. Even if one is inclined to believe that the Leafs' unravelling was a team effort (or lack thereof), it is difficult to argue that Mr. Franson did not play a major part in that collapse. Given his increased ice-time and his relative seniority on the Leaf blueline, Mr. Franson must be held accountable for his contribution to the team's downfall.

Comparable players

Jeff Petry

In 2013, Jeff Petry re-signed with the Edmonton Oilers to a one-year deal worth \$3.075 million¹⁹. Mr. Petry and Mr. Franson play similar roles on their respective teams as hard-hitting defencemen and have skated for a similar number of games in the platform season. Both players are also relatively injury-free while both leading their teams in hits in 2013-2014. Both players registered one power play goal²⁰.

Both Mr. Petry and Mr. Franson had abysmal plus/minuses in their platform season of negative-22 and negative-20, respectively. Mr. Franson, however, had the worst plus/minus on his team by a substantial margin. The second worst plus/minus on the Leafs in 2013-2014 was

¹⁷<http://www.nhl.com/ice/player.htm?id=8471742&view=splits&season=20132014&gameType=2>

¹⁸<http://www.nhl.com/ice/player.htm?id=8471742&view=splits>

¹⁹<http://www.capgeek.com/player/1659>

²⁰<http://www.nhl.com/ice/player.htm?id=8473507>

Tim Gleason's negative-14²¹. Not a single defenceman on the Oilers had a positive plus/minus last season²². Mr. Petry's plus/minus is comparatively less disappointing when viewed in this context.

Mr. Petry was matched up against some of the toughest offences in the entire league. Given the youthful composition of the Oilers' defence, Dallas Eakins had no choice but to send Mr. Petry against the likes of Ryan Getzlaf, Joe Pavelski, Anze Kopitar, Johnathan Toews and Ryan Kesler. While Mr. Petry was entrusted with a very difficult task, he was never expected to contain offences of that calibre on his own. Mr. Franson, on the other hand, had the luxury of playing alongside Jake Gardiner for the majority of his even-strength ice-time last season. Mr. Petry was paired up with rookie, Martin Marincin, and spent the majority of his even-strength ice-time with young forwards who surrendered 520 giveaways²³.

Another glaring difference between the two players is their special teams responsibilities. Unlike Mr. Petry, Mr. Franson logged a considerable amount of ice-time on the powerplay, averaging roughly 2:54 minutes per game in 2013-2014²⁴. Mr. Petry averaged only 0:50 minutes on the powerplay on any given night²⁵. Mr. Petry, however, averaged 3:03 short-handed minutes²⁶ while Mr. Franson only averaged 1:38²⁷ last season.

When you factor in the points that Mr. Franson registered in power play situations, the two players are not as statistically different offensively as one might be led to believe. While he

²¹<http://www.nhl.com/ice/playerstats.htm?fetchKey=20142TORSASALL&viewName=summary&sort=plusMinus&pg=2>

²²<http://www.nhl.com/ice/playerstats.htm?fetchKey=20142EDMDADALL&sort=plusMinus&viewName=summary>

²³<http://www.nhl.com/ice/playerstats.htm?fetchKey=20142EDMFALL&sort=takeaways&viewName=rtssPlayerStats>

²⁴<http://www.nhl.com/ice/player.htm?id=8471742&view=splits>

²⁵<http://www.nhl.com/ice/player.htm?id=8473507&view=splits>

²⁶Ibid

²⁷<http://www.nhl.com/ice/player.htm?id=8471742&view=splits>

may have had fewer points in the platform year, Mr. Petry scored more goals (7)²⁸ than Mr. Franson did (5)²⁹. Mr. Petry took 96 shots last season and scored 7.3% of the time³⁰. Mr. Franson, on the other hand, took 115 shots and scored only 4.3% of the time³¹. If anything, the shooting percentages indicate that Mr. Petry is more productive, shot-per-shot, than Mr. Franson.

In summary, Mr. Petry is a decent defenceman who plays a consistent two-way game on any given night. Mr. Franson, on the other hand, has had flashes of brilliance followed by months of unproductiveness and cannot be said to be a consistent two-way defenceman by any stretch. Both players log considerable minutes for their respective teams but Mr. Petry's evenly developed two-hundred-foot-game is more of an asset to the young evolving Oilers than Mr. Franson is to a Leaf team that sunk from a top seed in its division to a disappointing sixth in their division and well out of a playoff spot by the middle of March³².

Due to the similar levels of point production between Mr. Petry and Mr. Franson last season and the drastically divergent contributions to their respective teams and overall effectiveness as defencemen, the Maple Leafs submit that Mr. Franson is entitled to an award less than Mr. Petry's \$3.075 million salary.

Kris Russell

In February 2014, the Calgary Flames re-signed defenceman, Kris Russell, to a two-year deal worth \$2.6 million per season³³. When comparing Mr. Russell's statistics against Mr. Franson's, the similarities between the two become apparent.

²⁸<http://www.nhl.com/ice/player.htm?id=8473507&view=splits&season=20132014&gameType=2>

²⁹<http://www.nhl.com/ice/player.htm?id=8471742&view=splits>

³⁰<http://www.nhl.com/ice/player.htm?id=8473507&view=splits&season=20132014&gameType=2>

³¹<http://www.nhl.com/ice/player.htm?id=8471742&view=splits>

³²<http://www.nhl.com/ice/standings.htm?season=20132014&type=DIV>

³³<http://www.capgeek.com/player/599>

Both players were born in 1987 and both were selected in the third round of the 2005 NHL Entry Draft from the WHL³⁴. Not surprisingly, Mr. Russell and Mr. Franson had very similar points on a per-game basis in the platform year. In 68 games, Mr. Russell recorded 29 points, 22 of which were assists³⁵. Mr. Franson registered 33 points in 79 games, 28 of which were assists³⁶.

Mr. Russell played 11 fewer games in the platform year than Mr. Franson due to a knee injury suffered in December³⁷. Averaging 23:08 minutes per game like Mr. Russell did in 2013-2014 as a 5'10" defenceman certainly increases the probability of injury³⁸. Mr. Russell managed to bounce back and returned to the same level of overall consistency in the second half of the season where he registered 13 points from January to the season's end³⁹. It is worth noting that Mr. Russell managed to score more goals than Mr. Franson did in fewer games⁴⁰. Mr. Russell even tallied three more goals on the powerplay than Mr. Franson did⁴¹. Mr. Russell even scored a game-winning overtime goal and was also given an opportunity to impress in shootouts, which speaks to the level of trust his coach has in his offensive capabilities⁴². Mr. Franson has never scored a game-winning goal in his three seasons as a Maple Leaf⁴³ and Randy Carlyle, who was faced with 13 shootouts in 2013-2014, did not call upon Mr. Franson once⁴⁴.

While Mr. Franson's point totals have been very gradually improving over the last few seasons as a Leaf, his defensive production has been declining at a much faster rate. Since

³⁴<http://www.nhl.com/ice/player.htm?id=8471729>

³⁵Ibid

³⁶<http://www.nhl.com/ice/player.htm?id=8471742&view=stats>

³⁷<http://www.calgarysun.com/2013/12/21/calgary-flames-glencross-russell-injured-in-loss-to-penguins>

³⁸<http://www.nhl.com/ice/player.htm?id=8471729&view=splits&season=20132014&gameType=2>

³⁹<http://www.nhl.com/ice/player.htm?id=8471729&view=splits&season=20132014&gameType=2>

⁴⁰Ibid.

⁴¹Ibid.

⁴²Ibid.

⁴³<http://www.nhl.com/ice/player.htm?id=8471742&view=stats>

⁴⁴<http://www.nhl.com/ice/standings.htm?season=20132014&type=DIV>

signing with the Flames, Mr. Russell has become a key part of the Calgary defence. His platform year featured a career high in points that was rewarded with career highs in ice-time⁴⁵. Mr. Franson in 2013-2014 matched his career high in points from his 2010-2011 season with the Nashville Predators and cannot be said to have progressed in any substantial manner since leaving the Predators⁴⁶. It is worth mentioning, even if only in passing, that Mr. Russell's shooting percentage was 6.4% in the platform year, beating Mr. Franson's by 2.1 percentage points⁴⁷.

Neither the Leafs nor the Flames advanced to the post-season in the platform year. Mr. Franson, however, was an integral part of his team's demise whereas Mr. Russell played a consistent disciplined and determined shut-down role with fewer giveaways (39)⁴⁸ than Mr. Franson (68)⁴⁹. Given the totality of the comparison between Mr. Russell and Mr. Franson, the Maple Leafs submit that Mr. Franson is entitled to an award similar to Mr. Russell's \$2.6 million salary- but no more.

Conclusion

Mr. Franson's defensive porousness and inabilities, the capricious and unpredictable nature of his offensive game and his involvement in his team's collapse in the platform season present significant concerns for the Leaf organization. A holistic comparison of Mr. Franson to other comparable defencemen who have received similar awards in the last season shows that Mr. Franson is entitled to an award below the midpoint figure of \$3.3 million and that \$2.5 million is an appropriate and fair award.

⁴⁵<http://www.nhl.com/ice/player.htm?id=8471729>

⁴⁶<http://www.nhl.com/ice/player.htm?id=8471742&view=stats>

⁴⁷<http://www.nhl.com/ice/player.htm?id=8471729&view=splits&season=20132014&gameType=2>

⁴⁸<http://www.nhl.com/ice/player.htm?id=8471729&view=splits&season=20132014&gameType=2>

⁴⁹<http://www.nhl.com/ice/player.htm?id=8471742&view=splits>

