**IN THE MATTER OF SALARY ARBITRATION BETWEEN:**

**CODY FRANSON**

**-AND-**

**THE TORONTO MAPLE LEAFS**

**BRIEF OF THE TORONTO MAPLE LEAFS**

**TEAM 30**



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**INTRODUCTION AND OVERVIEW**

In accordance with section 12.9 of the NHL’s Collective Bargaining Agreement, this brief serves to evaluate the contributions and performance of the Toronto Maple Leafs’ Cody Franson. Although Mr. Franson is a valued member of the Toronto Maple Leafs, the organization has valid concerns regarding his lack of skill and consistency in the defensive zone, as well as his diminished offensive production over the course of his career. Accordingly, the Maple Leafs submit Mr. Franson is fairly entitled to an award below the $3.3 million midpoint figure, and that a $3 million award is both fair and appropriate.

1. **Defensive Struggles**

While Mr. Franson has shown some success offensively, he has significantly struggled in the defensive zone throughout his career. Mr. Franson’s sluggish skating and inability to react quickly in his own zone have demonstrated that he is a one dimensional defenseman at best. Although Mr. Franson stands roughly 6 feet 5 inches, he demonstrates an inability to control players down low which, when combined with his sub-par skating, makes him suspect on the back end. Such uninspiring defensive performance has hindered Mr. Franson’s ability to develop as a complete defenseman.

 Mr. Franson’s underwhelming defensive performance has proven to be a liability for the team as a whole. In the 2013-2014 season, the Maple Leafs ranked dead last in shots allowed, at 1606, and 5th worst in goals against, at 252.[[1]](#footnote-1) It is very difficult for any team to succeed when its defensive performance ranks this poorly. Mr. Franson’s poor defensive performance is highly attributable to each of these team statistics, as he ranked second on the team in shifts played per game.[[2]](#footnote-2). Furthermore, Mr. Franson ranked last on the team in plus/minus with an astonishing -20 in his platform season. In fact, Mr. Franson’s plus/minus was 6 points worse than the second worst player on the team and ranked 860th of all 886 players in the NHL. These stats demonstrate that the team’s defensive struggles were highly attributable to Mr. Franson’s poor defensive performance.

1. **Diminished Offensive Production**

Mr. Franson’s true value comes from his ability to be an “offensive-defenseman” for the team. However, upon examining Mr. Franson’s statistics, it becomes apparent that his offensive production has significantly diminished over the course of his career. In Mr. Franson’s first 145 games in the NHL he scored 14 goals. Unfortunately, in his most recent 145 games Mr. Franson’s goal production has dropped 28%, as he scored only 10 goals. As an offensive-defenseman, it is reasonably expected that your offensive production increases as you mature in your career. This, however, is not the case for Mr. Franson, as his offense production has clearly declined over the course of his career. Further exacerbating this point is the fact that Mr. Franson’s ice time has increased substantially over the past several seasons. Mr. Franson’s average ice time has increased nearly five minutes per game in the last three years, as his per game average rose from 16:11 in 2011-2012, to 18:47 in 2012-2013, and up to 20:42 in 2013-2014.[[3]](#footnote-3) However, despite this increase in playing time, Mr. Franson’s offensive production continues to decrease.

In addition to his lack of goal scoring, Mr. Franson’s diminished offensive production can also be illustrated by the decrease in his average points per game. Over the last two seasons, Mr. Franson has experienced an exorbitant 36% decrease in his average points per game, dropping from .644 points per game in 2012-2013 to .41 points per game in 2013-2014. [[4]](#footnote-4)

As a young twenty-seven year old player, Mr. Franson’s offensive production should be steadily increasing each season. Instead, statistics show that Mr. Franson’s offense is diminishing both in goals scored and average points per game. As a one-dimensional player, such a lack in offensive production truly diminishes his value to the team.

1. **Valid Comparable Players**
2. **T.J. Brodie – Calgary Flames**

Following the 2013-2014 season, T.J. Brodie signed a two year deal worth an average of $2.125 million. [[5]](#footnote-5) Mr. Brodie and Mr. Franson maintain almost identical roles for their respective teams, namely that of an offensive-defensemen. Last year, Mr. Brodie’s stats were strikingly similar to that of Mr. Franson. In 81 games, Mr. Brodie registered 4 goals and 27 assists, compared to Mr. Franson who accumulated 5 goals and 28 assists.[[6]](#footnote-6) This represents just a two point difference in the two players. Although these two individuals maintain a small gap in age and experience, Mr. Brodie’s offensive output was rather impressive for a 23 year old who was in just his third full season in the league. In comparison, Mr. Franson only put up 5 goals and 16 assists in his third season in the league.[[7]](#footnote-7) This illustrates that Mr. Brodie has developed very quickly into an offensive threat. Unlike Mr. Franson whose offense has diminished over the course of his career, Mr. Brodie has continuously increased his offensive production in each year of his career. As just a 24 year old, Mr. Brodie shows much more future potential than Mr. Franson.

While both of these players are considered offensive-defenseman, Mr. Franson has proven to be much more of a liability in the defensive zone. Mr. Franson is known to be a poor and sluggish skater, particularly in his own defensive zone, compared to Mr. Brodie who is much quicker and more agile. This skill set allows Mr. Brodie much more room to grow defensively. Mr. Franson’s inferior defensive skill becomes apparent when comparing the two players’ plus/minus rating from last season. Mr. Franson ranked last on his respective team with a -20 rating, while Mr. Brodie ranked in the top third of his team with a 0 rating. This stat shows that Mr. Brodie was able to provide more than just offensive production to his team. Mr. Brodie’s defensive play helped contribute to his team ranking 8th best in the entire league in shots allowed, as compared to Mr. Franson’s team who ranked 30th. By limiting the number of shots your team faces, you are able to significantly help improve your chances of winning the game.

Both Mr. Brodie and Mr. Franson play similar roles for their respective team as an offensive-defenseman. Each player produced nearly identical stats in their platform season. Given these parallels, the Maple Leafs submit that Mr. Franson is fairly entitled a salary similar to that of Mr. Brodie at $2.125 million and no more than $3 million.

1. **Chris Tanev – San Jose Sharks**

In July 2014, Chris Tanev signed a one year deal with the Vancouver Canucks for $2 million.[[8]](#footnote-8) As a mobile, puck moving defenseman Mr. Tanev has enormous upside potential for the Canucks. Mr. Tanev plays the role of a shutdown defenseman, regularly facing the opposing teams’ top players. In his platform season, Mr. Tanev proved his defensive value by ranking second on the team with a plus/minus rating of +12 and tying for the team lead in blocked shots with 136.[[9]](#footnote-9) Such impressive stats were noticed by the coaching staff, who entrusted Mr. Tanev to play over 3 minutes per game on the penalty kill in his platform season. Conversely, Mr. Franson, in his platform season, had a plus/minus rating of -20. Furthermore, Mr. Franson was only entrusted to play only 1:38 short-handed minutes per game.[[10]](#footnote-10)

Mr. Tanev is also a very disciplined player, which is an extremely valuable quality for a defenseman to possess. A defenseman who reacts too slowly and gets caught flat-footed frequently responds to his poor positioning by taking a lazy penalty. In his entire platform season, Mr. Tanev only had four penalties totaling 8 minutes. In comparison, Mr. Franson had more than three times as many penalties (15), totaling 30 minutes.

Offensively, Mr. Tanev’s statistics are not overly-impressive. However, his 17 points last season were enough to put him in the top half of all Vancouver’s defenseman last season.[[11]](#footnote-11) This illustrates that Mr. Tanev is more than a one dimensional player for his club. Although he is relied upon to be shutdown defenseman for the team, he is still able to produce offensively. This however cannot be said about Mr. Franson who has proven to be a liability in his defensive zone.

Despite Mr. Tanev being a shut-down defenseman and Mr. Franson being an offensive-defenseman, the two players are similar in that they are able, at a minimum, to provide one solid dimension for their club. As a result, the Maple Leafs submit that Mr. Franson is entitled to an award similar to that of Mr. Tanev, around $2 million.

1. **Conclusion**

Mr. Franson is a valuable member of the Maple Leaf’s organization. However, the club has legitimate concerns about his one-dimensional skill set which has proven to be a defensive liability for a club which is already struggling defensively. Furthermore, Mr. Franson’s offensive production, which is thought to be his strong suit, has significantly diminished in his platform season. As a result, we submit that Mr. Franson is fairly entitled to a salary below the midpoint of $3.3 million, and that a $3 million dollar salary is more appropriate.

1. www.nhl.com/ice/teamstats [↑](#footnote-ref-1)
2. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-2)
3. Id. [↑](#footnote-ref-3)
4. Id. [↑](#footnote-ref-4)
5. Capgeek.com/player/1537 [↑](#footnote-ref-5)
6. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-6)
7. Id. [↑](#footnote-ref-7)
8. http://capgeek.com/player/1775 [↑](#footnote-ref-8)
9. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-9)
10. Id. [↑](#footnote-ref-10)
11. Id. [↑](#footnote-ref-11)