

NHL SALARY ARBITRATION

BETWEEN:

MATS ZUCCARELLO

- AND -

THE NEW YORK RANGERS

BRIEF IN SUPPORT OF THE NEW YORK RANGERS

**Team 16
"Club"**

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I: INTRODUCTION

The following brief has been prepared on behalf of the New York Rangers (“the Club”), as part of the salary arbitration for the defenseman Mats Zuccarello (“the Player”). The information outlined in this brief conforms to the evidentiary rules of the NHL’s Collective Bargaining Agreement¹ and begins in section two with an overview of the Player, followed by his NHL career statistics. This will be supplemented by his injuries and games missed in relation to how many games he has played for his career. Finally an analysis of the Player’s value, service, and contribution to the Club will be discussed along with his special qualities, off-ice work, and public appeal. The third section contains a comparison of players which focuses on the relative performance and value of the Player. This brief concludes with the submission that any award received by the Player should be less than \$1.15 million per year.

II: PLAYER

(A) Overview of Career

Mats Zuccarello is a forward with the New York Rangers. He is 5 foot 7 inches tall, and weighs 179 pounds. He is 25 years old and has 3 years of NHL experience. He played professional hockey in Europe before signing with the Rangers in 2010. He joined the club immediately, but has spent most of the time since coming to the league in the AHL for development. In the few NHL games that the Player has played in, his impact has been minimal.

(B) Statistics and Experience

The Player’s career stats are outlined below. Overall, Zuccarello has not played a lot of NHL games in the three seasons he has spent with the Rangers. While his plus minus rating was

¹ 2012 NHL CBA, Article 12, http://cdn.agilitycms.com/nhlpacom/PDF/NHL_NHLPA_2013_CBA.pdf.

impressive, it does not mitigate the fact that the Player has not done much in terms of scoring. Last season, the Player's points per game average was 0.53, which is actually lower than his first year point per game average of 0.54. Furthermore, last year was the only year in which he did not have a game winning goal, and last year's shooting percentage is significantly lower than that of the year before.

Figure 1: NHL Career Statistics²

Year	Team	GP	G	A	PTS	+/-	PPG	PPA	SHA	GWG	Shot %	Hits
12-13	NY	15	3	5	8	10	0	1	1	0	11.11	27
11-12	NY	10	2	1	3	0	1	1	0	1	20.00	8
10-11	NY	42	6	17	23	3	0	9	0	2	8.11	56
Total		68	11	23	34	13	1	11	1	3	9.91	93

Zuccarello has failed to portray himself as an outstanding player in the playoffs. He missed the playoffs in the 2011-12 season due to injury. In 2012-13, he did manage to play in 12 playoff games and was able to register some points. However, he did not score any power play goals, short-handed goals, or game winning goals during that time. The 7 points that he did register were certainly important, but are overshadowed by the fact that his plus minus rating was -2 for the playoffs.

Figure 2: NHL Playoff Statistics³

Year	Team	GP	G	A	PTS	+/-	PPG	PPA	SHG	SHA	GWG	PIM	Shots	Shot%
12-13	NYR	12	1	6	7	-2	0	3	0	0	0	4	22	4.55
11-12	NYR	0	0	0	0	0	0	0	0	0	0	0	0	0
10-11	NYR	1	0	0	0	0	0	0	0	0	0	2	1	0
Total		13	1	6	7	-2	0	3	0	0	0	6	23	4.35

² <http://www.nhl.com/ice/playerstats.htm>.

³ <http://www.nhl.com/ice/playerstats.htm>.

(C) Games Played and Injuries

The Player during his NHL careers has suffered only one injury. However, the injury that he sustained was quite serious as it was a season ending injury during the 2011-12 campaign, and accordingly he did not contribute during the strong playoff run by the Rangers that year.

Figure 3: Injury Report

Season	Type of Injury/Reason	# of Games Missed
2011-2012	Broken Wrist	8 regular season and 20 playoff games

(D) Length of Service and Value to Club

The player has only been with the Rangers for 3 years, and has not demonstrated that he is a valuable part of the team. His contribution is appreciated, but not worth \$1.15 million as in the last two seasons he has only managed to play in 25 NHL games.

(E) Qualities, Off-Ice Incidents and Public Appeal

The Player represented his native Norway in numerous international competitions including the numerous International Ice Hockey Federation Championships as well as in the 2010 Winter Olympics.⁴ The Player is not involved in any community activities within the N.Y areas and is not considered a fan favourite given his short period of playing with the Club.

III: COMPARABLES

This section compares the statistics of the Player with those of other NHL defenseman who are eligible for salary arbitration this year or who were eligible last year. This section

⁴ <http://rangers.nhl.com/club/atrplayer.htm?id=8475692>.

highlights and compares general information such as height, weight, age, number of seasons and salary of the respective Players. There is also a comparison of both the Player and their counterparts' career statistics as well as a comparison of their most recent years of play; both of these are listed in figures for ease of reference. Ultimately, an analysis of all the factors leads to the conclusion that Zuccarello's midpoint salary is too high and unreasonable when compared with others with better statistics and who make a more positive contribution to their team.

(A) Comparable 1: Trevor Lewis

First, a close comparable to the Player is Trevor Lewis. Lewis is a 26 year old, 6'1, 199 pound defenseman for the New Jersey Devils⁵. Lewis has played in the NHL for five seasons and has amassed respectable statistics. Comparatively speaking, Lewis' and the Player have roughly the same number of goals and assists. While it is important to note that Zuccarello has played in a fewer number of games, it is also important to acknowledge that Lewis is the more durable player, as evidenced by the fact that Lewis has played in 72 games in each of the last two full seasons and played in all 48 games of the last shortened season. Lewis was a highly ranked prospect, as evidenced by him being selected in the 1st round of the 2006 draft as the 17th overall pick. Zuccarello, on the other hand, was not drafted. The main difference seems to be that Lewis has been able to play close to a full 82 game season and the Player has not been able to do so in his entire career. This raises concerns about the Player's ability to compete at a high level for an entire season when the league will revert back to the full schedule.

Career statistics aside, the performance of both players for individual seasons further demonstrates the positions of the club. During the shortened 2012-13 season, Lewis scored 2 game winning goals and had a plus minus rating of +5. While the Player's plus minus rating was

⁵ <http://www.tsn.ca/nhl/teams/players/bio/?id=5708>.

higher, he did not score any game winning goals. In fact, the Player only took 27 shots on goal in the entire 2012-13 season, whereas Lewis took 92. Ultimately, it is not surprising that Lewis's contribution is greater since he was more often than not an active member of the King's roster.

Based on the information above, it is important to note that Lewis has a 1 year, \$1.325 million salary during the off season. Given that the statistics above demonstrate that Lewis is both a better and more durable player, it is reasonable to adopt the position that the Player should be awarded a salary that is far less than that of Lewis. Furthermore, the Player's inability to perform well enough to be called on to play in a greater number of the team's games supports the position that the Player should not earn an amount that is even close to what Lewis earns.

Figure 4: NHL Career Statistics⁶

Name	GP	G	A	PTS	+/-	GWG	Shots	Shot %
Zuccarello	68	11	23	34	13	3	111	9.91
Lewis	204	12	25	37	-12	5	315	3.81

Figure 5: Comparison: 2011-12 and 2012-13 Stats⁷

Year	Team	Player	GP	G	A	PTS	+/-	SHA	GWG	Shots	Hits
12-13	NYR	Zuccarello	15	3	5	8	10	1	0	27	27
11-12	NYR	Zuccarello	10	2	1	3	0	0	1	10	8
12-13	LA	Lewis	48	5	9	14	5	1	2	92	83
11-12	LA	Lewis	72	3	4	7	-3	0	1	103	117

(B) Comparable 2: Dale Weise

Secondly, Dale Weise is comparable to the Player also. Weise is a 25 year old, 6'2, 210 pound defenseman for the Vancouver Canucks⁸. Lewis has played in the NHL for 3 seasons and

⁶ <http://www.nhl.com/ice/playerstats.htm>.

⁷ <http://www.nhl.com/ice/playerstats.htm>.

⁸ <http://www.tsn.ca/nhl/teams/players/bio/?id=5708>.

has amassed consistent statistics. Comparatively speaking, Weise is a more reliable and durable defenseman. Each season, he plays more games than the last, which demonstrates his commitment to the team as well as his continued improvement. While it is important to note that Weise has a lower plus minus rating and a lower shots per game average, it must be noted that Weise lives up to his role as a defenceman by registering a significant number of hits. Last season, Weise registered over 2 hits per game while Zuccarello registered less than 2 hits per game. Weise was also drafted in the 4th round of the 2008 NHL draft, and thus a budding prospect, whereas Zuccarello was not drafted at all. As with the comparison of Trevor Lewis, the main difference in this comparison appears to be the inability of Zuccarello to stay on the Ranger's starting line-up. Zuccarello has not played often enough. This underscores the concerns about the Player's ability to contribute positively during an entire season.

Finally, Weise received a 1 year, \$700,000 contract during the off season. While the statistics may suggest that Zuccarello is a better offensive player, the detailed analysis provided demonstrates clearly that Weise is a better-rounded defenceman. Accordingly, the Club is of the position that the salary awarded to Zuccarello should be similar to the salary of Weise. Granted that Zuccarello's has offensive upside, thus it may be appropriate to award Zuccarello a salary that is higher than that of Weise. That said, such an award should be significantly lower than the one year \$1.15 million midpoint for Zuccarello.

Figure 6: NHL Career Statistics⁹

Name	GP	G	A	PTS	+/-	GWG	Shots	Shot %	Hits
Zuccarello	68	11	23	34	13	3	111	9.91	93
Weise	119	7	7	14	-10	2	92	7.61	222

⁹ <http://www.nhl.com/ice/playerstats.htm>.

Figure 7: Comparison: 2011-12 and 2012-13 Stats¹⁰

Year	Team	Player	GP	G	A	PTS	+/-	GWG	Shots	Hits
12-13	NYR	Zuccarello	15	3	5	8	10	0	27	27
11-12	NYR	Zuccarello	10	2	1	3	0	1	10	8
12-13	VAN	Weise	40	3	3	6	-7	2	35	84
11-12	VAN	Weise	68	4	4	8	-1	0	48	118

(C) Comparable 3: T.J. Galiardi

Lastly, T.J. Galiardi is comparable to the Player. Galiardi is a 25 year old, 6'2, 195 pound defenseman for the Calgary Flames¹¹. Galiardi has played in the NHL for 5 seasons and has amassed impressive statistics. Galiardi is clearly more reliable and durable defenceman. That said, Galiardi has a history of injuries which surely, to some degree, is reflected in his salary. While it is important to note that Galiardi has a lower plus minus rating than Zuccarello, it must be noted that Galiardi has more game winning goals, power play goals, shorthanded goals and overall points. Ultimately, this translates to more NHL experience and therefore, a greater value to a team. Galiardi was drafted in the 2th round of the 2008 NHL draft, where as Zuccarello was not drafted at all. Overall, the main difference in this comparison appears to be the inability of Zuccarello to stay on the Ranger's starting line-up. This underscores the concerns about the Player's ability make a meaningful contribution to the Club.

Based on the information above, it is important to note that Galiardi received a 1 year, \$950,000 contract during the off season. While the statistics may suggest that Zuccarello is a better offensive player, the detailed analysis demonstrates clearly that, overall, Galiardi is a better defenceman. Accordingly, the Club is of the position that the salary awarded to Zuccarello should be similar the salary of Galiardi. Zuccarello's offensive potential may warrant

¹⁰ <http://www.nhl.com/ice/playerstats.htm>.

¹¹ <http://www.tsn.ca/nhl/teams/players/bio/?id=5708>.

a salary that is similar to that of Galiardi, but any salary awarded to the Player should be significantly should be lower than \$1.15 million.

Figure 8: NHL Career Statistics¹²:

Name	GP	G	A	PTS	+/-	PPG	SHG	GWG	Shots	Shot%	Hits
Zuccarello	68	11	23	34	13	1	0	3	111	9.91	93
Galiardi	222	39	48	87	-12	3	2	6	379	10.29	398

Figure 9: Comparison: 2011-12 and 2012-13 Stats¹³

Year	Team	Player	GP	G	A	PTS	+/-	PPG	PPA	GWG	Hits
12-13	NYR	Zuccarello	15	3	5	8	10	0	1	0	27
11-12	NYR	Zuccarello	10	2	1	3	0	1	1	1	8
12-13	SJ	Galiardi	36	5	9	14	1	1	1	0	36
11-12	COL/SJ	Galiardi	69	9	6	15	-8	0	0	2	110

IV: CONCLUSION

Ultimately, an analysis of Mats Zuccarello's career highlights the significant concern that the Club has about the Player's ability to make a meaningful contribution to the Rangers on an ongoing basis. Accordingly, he should be paid less than the midpoint salary of \$1.15 million. A higher award would result in the Player earning more than other defencemen who make a more significant contribution to their respective teams. The salary that is awarded to the Player should not only be fair, but should be comparable to the salary paid to the defencemen who have better statistics, durability and games played. Therefore, the Club respectfully submits that the Player's salary for the upcoming year should be less than \$1.15 million per season.

¹² <http://www.nhl.com/ice/playerstats.htm>.

¹³ <http://www.nhl.com/ice/playerstats.htm>.