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James C. Owens,
Acting Administrator
National Highway Traffic Safety Administration
Docket Management Facility
1200 New Jersey Avenue S.E.
West Building Ground Floor, Room W12-140
Washington, D.C. 20590-001

28th January 2020

Dear Acting Administrator Owens:

**Re: Docket No. NHTSA-2019-0121: Notice of Proposed Rulemaking:
Replica Motor Vehicles**

Morgan Motor Company, www.morgan-motor.co.uk, has been in continuous business in the UK for more than one hundred and ten years, building traditional English sports cars. We are proud to have reached an automotive industry milestone attained by few others. See attached historical summary of the company's first 100 years.

We submit the attached comments in response to the Replica Law Notice of Proposed Rulemaking published at 85 FR 792 (Jan. 7, 2020).

Respectfully submitted,

Morgan Motor Company



MORGAN MOTOR COMPANY LIMITED

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*Registered in London Number 07459137.
Chief Executive Officer: S.D. Morris.
Director: C. Boden*



COMMENTS OF MORGAN MOTOR COMPANY ON
NHTSA REPLICA CAR PROPOSED RULES

1. Definitions

- Replica motor vehicle must replicate a “vehicle that was manufactured not less than 25 years before the replica motor vehicle”
 - Morgan is producing today the same body design that Morgan introduced in the 1960s, which is indeed similar to our body design even earlier in the 20th century. We are pleased that the Replica Law will allow us to offer replicas of our iconic British design to American consumers.
- Requirement to resemble the replicated vehicle.
 - NHTSA has proposed that “the documentation must demonstrate that the replica vehicle has the same length, width and height as the original.”
 - ✓ We urge NHTSA to include a measure of flexibility. A degree of size flexibility is important because of packaging requirements demanded by today’s safety technology as well as modern drivetrains, with current emissions control systems. As regards the permissible dimensions of a replica, we propose that NHTSA align itself with the California Air Resources Board replica vehicle dimension requirements so that the replica vehicle dimensions must be within 10% of the length, width and height of the vehicle being replicated.
 - At one point in the Federal Register notice, NHTSA states that the the concept of “body” includes “both exterior and interior characteristics”
 - ✓ We urge the removal of “interior” from the issue of what constitutes a “body”. It may be impossible for a replica produced on a more advanced vehicle platform to replicate the interior of the original vehicle. Moreover, the term “body” should be used in its common meaning, which does not include the interior.
 - ✓ Indeed, we support NHTSA’s decision that is stated elsewhere in the proposal where the agency says, “we propose that the interior of the replica vehicle does not need to “resemble” that of the original vehicle”.
 - ✓ The vehicle interior should simply not be relevant to the “resemble” criterion.



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- “NHTSA requests comment on... whether the logos and emblems from the original vehicle” must/ should be reproduced on a replica vehicle.
 - ✓ The Replica Law does not require this, and such a requirement should not be in NHTSA’s rules (even though this issue is not a concern for Morgan).

2. Requirement to manufacture under license agreement for intellectual property rights.

- Morgan strongly supports the proposal’s requirement, as stated also in the statute, that the replica must be produced either under a license or “manufactured by a current owner of such intellectual property, including, but not limited to, product configuration trade dress, trademark, and patent rights.”
 - The preamble further explains “The statute is ambiguous concerning the treatment of current owners of intellectual property rights that wish to manufacture replica vehicles. That is, the statute could arguably be read to require license agreements even when the current owner of the intellectual property also intends to manufacture the replica vehicles. NHTSA believes this creates an unnecessary step for current rights holders and does not meet Congress’ intent with these requirements. Accordingly, NHTSA interprets the licensing requirement to apply only when a manufacturer intending to produce replica vehicles does not own the intellectual property rights to the original vehicle (which is being replicated).
 - Accordingly, section 586.6(b)(4) should read as follows:

A certification that either:
the manufacturer has determined the intellectual property rights required and obtained all licenses and permissions necessary to legally produce the replica
or
the manufacturer is the current owner of such intellectual property, including, but not limited to, product configuration trade dress, trademark, and patent rights.

3. Safety Requirements

- Considered requirements.
 - Other than requiring compliance with equipment FMVSS, it is beyond the scope of NHTSA’s authority under the Replica Law to promulgate safety standard requirements applicable to replicas.



4. Labels and other disclosures

- Permanent Part 567 label
 - The permanent label should be able either to state which FMVSS are exempted, or in the alternative which FMVSS are met – this would allow a smaller label with fewer words

- Temporary Labels
 - NHTSA has requested comments on... “whether the warning should also be provided on an advertisement”
 - We should suggest that this is unnecessary -- warnings at point of sale would be seen when the car is viewed, and the notice statement be given to the buyer, together providing sufficient information to permit an informed decision.

5. (Federalism)

- Allowing states to require an exempted vehicle to comply with state safety standards which cover the same subject matter for which the replica vehicle is exempted under the Replica Law would entirely undermine the intention of the Replica Law -- to provide certain flexibilities for eligible, small niche manufacturers. The Replica Law was meant to supersede state laws regarding safety standard compliance.



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HISTORY OF MORGAN MOTOR COMPANY



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H.F.S., the founder, in 1913

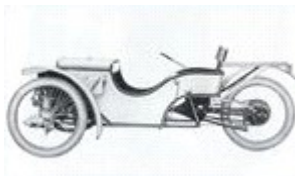
The man who guided the destinies of the Morgan car for almost fifty years, H.F.S. Morgan, was born at Morton Jeffries Rectory, Herefordshire in 1881. His father was the Reverend Prebendary H G Morgan at Stoke Lacy and he married Ruth, the daughter of the late Reverend Archibald Day, formally vicar of St Matthias, Malvern Link.

H.F.S., as his loyal workers and personal friends knew him, was educated at Stone House, Broadstairs, Marlborough College and at the Crystal Palace Engineering College. He began his career as the 18 year-old pupil of William Dean, Chief Engineer of the GWR Railway Works at Swindon, where he worked as a draughtsman in the drawing office of seven years.

Whilst making a modest contribution to the history of steam H.F.S.'s loyalties were divided between the locomotive and the motor car.

After a hair-raising first drive in a 3 _ h.p. Benz that ran away with him down the 1-in-6 gradient of a hill between Bromyard and Hereford, he emerged intact but considerably poorer. Damages to the car cost about £28 for repairs and delayed his ambition of owning his own car.

He left the GWR in 1906 and at the age of 25 opened a garage and motor works in Malvern Link where he ran a most successful bus service with a special 10 hp Wolseley 15-seater. These ran from Malvern Link to the Wells and later from Malvern to Gloucester. He also became the district agent for Wolseley and Darraq.



The original Morgan three-wheeler as shown at Olympia.

his own three-wheeler.

Eventually he could afford to purchase a motor vehicle an Eagle Tandem. Previously he had hired his cars including the ill-fated Benz, from a Mr Marriot, the first motor trader in Hereford. The Eagle was a three-wheeler fitted with an 8 h.p. water-cooled De Dion engine and it was from his experiences with this machine and a 7 hp. two cylinder car called "The Little Star" that he had the idea of making

He bought a 7 hp Twin-cylinder Peugeot engine and mounted it into a light Three-wheeled tubular chassis. The first Morgan Runabout had been born!

With very little facility for machine work in his garage, help was gratefully received from Mr Stephenson Peach, then Engineering master at Malvern and Repton Colleges and the grandson of the designer of the "Rocket".

The first design was successful due to its rigid frame, light weight and independent front suspension. Another important factor was the unusual power to weight ratio of 90 brake horsepower per ton, which enabled this little vehicle to accelerate as fast as any car being produced at that time.



MORGAN MOTOR COMPANY LIMITED

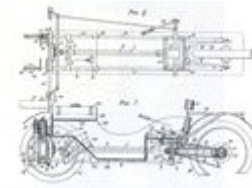
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The patent drawings of the first Morgan three-wheeler drawn by John Black

Initially, there was no intention of marketing the vehicle. Only after much favourable comment was the decision made to build a few. With capital for some machine tools and an extension to the Malvern Garage provided by his father the rector, H.F. S. Morgan began manufacture in 1910. A patent was granted, the patent drawings being produced by a bright youth who was later to become famous as Sir John Black of the Standard Motor Company.



The Morgan name made its very first public appearance at the Olympia Motor Show in 1910. Two three-wheelers, both single seaters fitted respectively with 8 hp Twin and 4 hp Single cylinder J.A.P. engines, secured some orders, but it soon became apparent that for the vehicles to be universally popular they would have to become two-seaters.



The chassis erecting shop in 1912

It was whilst the two-seater version was in preparation that H.F.S Morgan entered his single-seater in the London-Exeter-London Reliability Trial, gaining a gold medal, the highest possible award. The first two-seaters made their appearance at the 1911 Olympia Show. They were fitted with 8 h.p. engines. They attracted the interest of the managing director of Harrods, Mr Burbridge, and as a result the car appeared in the shop window of the famous store, the only car ever to have done so.

At the 1911 Show the orders received were so many more than Mr Morgan could cope with at Malvern that he approached several large manufacturers to make cars for him. It was fortunate that they turned him down and with the help of deposits on orders he was able to purchase more machine tools and make further extensions to his garage.

1913 - Sports Runabout

The Morgan Motor Company was formed as a private Limited Company in 1912 with the Reverend H.G. Morgan as Chairman and his son as Managing Director. The site of the first factory was on the Worcester road leading into Great Malvern. H.F.S. and his wife Ruth lived next door in a small terraced house.



During this period the Morgan name was heard for the very first time in racing circles when a Mr Henry Martin easily won an International Cyclecar Race at Brooklands. In 1912 H.F.S. Morgan broke the 1100 cc. One-hour Record travelling at a fraction short of 60 mph for one hour at Brooklands. His father the Prebendary H.G Morgan was present and this is probably the only time a top hat has ever been worn at the popular circuit.

From the start it was very much a family business and Mr H.F.S Morgan's sister, Miss Dorothy Morgan, was a regular entrant in reliability trials gaining many first class awards in a Morgan three-wheeler. In 1913 a Morgan made the fastest time at the celebrated Shelsey Walsh Hill Climb at an average speed of 22 mph. And at the end of the year the Morgan Runabout had gained a greater number of awards for reliability and speed than any other Cyclecar or Light Car.



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W.G. McMinnies with passenger on the tail.

At this time a Morgan three-wheeler seating two people could be bought for 85 guineas, and one of them entered in the Cyclecar Club's "Fuel Consumption Trial" won the event with an average consumption of 69.4 mpg.

In 1913 the company produced some racing cars with longer chassis and lower seating with o.h.v. J.A.P. engines. One of them was entered in the French Grand Prix at Amiens and won against strong opposition from many continental four-wheelers. This in spite of an enforced stop to change an inner tube in one of the front tyres!

W.G. McMinnies and his mechanic Frank Thomas, after winning the French Cyclecar Grand Prix.

The driver of the car, Mr McMinnies was the editor of the "Cyclecar" and his success gave Morgan a great deal of publicity. After the event he christened his particular car "jabberwocky of Picardy", but the car became officially known as the "Grand Prix" and one contemporary owner, Captain Ball, the First World War flying ace, said to drive this car was the nearest thing to flying on the ground.

During the First World War only a small number of cars were produced and the works manufactured munitions and machinery for the war effort.

After the outstanding success of 1913 it was unfortunate that in 1914 the Morgan was excluded from the RAC Lightcar and Cyclecar Trial because it had only three wheels instead of four. This was a portent too significant to go unnoticed, A four-wheeler was designed to be fitted with a Diorman four-cylinder engine but the model never went into production. It was to be twenty-two years before the first four wheeler was introduced.



Prototype Four-seater

The evolution of the Morgan with a model of family dimensions (designed in 1912) came in 1915 when a four-seater was produced for Mr Morgan and his family. After the Great War this model was marketed as the Family Runabout and sold in large numbers.

The demand for inexpensive transport was great and a new factory was built at Pickersleigh Road to enable production to reach fifty cars a week. This made Morgan one of the largest British car producers at the time.

The Pickersleigh Road Factory

Situated on the Madresfield estate, the new factory was opened in 1918 and H.F.S. Morgan's daughter, Sylvia laid the cornerstone. This is now the site of the present factory, which has traditionally been known as the "Works".



Mr George Goodall joined the firm in 1925, taking over the position of General Manager from Mr A Hales who had been with H.F.S since 1911. George went on to become Managing Director of the Company, a position from which he retired at the end of 1958 whilst still retaining a seat on the Board.



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The cover of the Morgan catalogue

So advanced had been H.F.S. Morgan's first designs that little alteration, apart from bodywork modifications, were required for some years. Electric lamps and starters were added and as a result of Trials experience front wheel brakes were installed. The Morgan car became one of the first in the field to enjoy this innovation.



1925 - H.Beart in the record breaking Morgan with Blackbourne engine

The Morgan continued to have success after success in racing and was so fast that at Brooklands it was required to start a lap behind four wheeled cars in the same class.

The patent drawings of the first Morgan three-wheeler drawn by John Black

Morgan three wheelers sold well abroad. In France a Monsieur Darmont bought a patent from H.F.S. Morgan to manufacture the car as the Darmont Morgan



Mrs Gwenda Stewart in her record breaking Morgan with J.A.P. engine at Monthlery.

During 1930 Mrs Gwenda Stewart broke the one hour Record at Monthlery at a speed of over 100 mph. She was later to achieve 117 mph in a single seater Morgan on the long straight at Arpajon nearby.

1931 brought a new model with three forward speeds and a reverse, a single chain and detachable wheels.

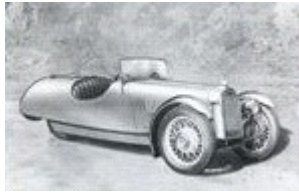
The rugged strength of the Morgan and its excellent traction meant that it performed well on muddy hills when taking part in reliability trials.



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1933 "F" Super Two-seater with Ford 10 h.p engine

1933 was a vintage year for Morgan, bringing in its train a large number of world records and the advent of a new model fitted with a Ford engine. With its flat radiator this was the most popular three-wheeler ever produced and encouraged a number of firms to copy the idea.

In 1936, after a prototype had been tested in trials and on the track, a four-wheeler was exhibited at the London and Paris Exhibitions. The new model was called the Morgan Four Four to differentiate it from the three-wheeler, indicating four cylinders and four wheels. The car had a Z section full width steel chassis with boxed cross members and the body was an ash frame panelled in aluminium. The combination provided the durability of a coach-built car with the lightness required for a sports car. The car was an immediate success.

George Morgan, in top hat, wishing H.F.S. good luck on his record attempt

In 1937 H.F.S.'s father Prebendary George Morgan died peacefully at home. Mr H.F.S. Morgan became Chairman and Governing Director and his board included Mrs H.F.S. Morgan. Mr George Goodall and Mr T.H. Jones who had been with the firm since 1912.



After the success of the Morgan Four Four roadster a four-seater was introduced, followed in quick succession by a Drophead Coupe in 1938.



The Four Four 4 seater.

In 1937 a few special sports models were built for racing fitted with 1098 c.c. Coventry Climax engines developing 42 bhp with balanced crankshafts. Prudence Fawcett competed at Le Mans in 1938 and qualified for the Biennial Cup. White and Anthony again came first in class at Le Mans in 1939 and one of these cars was very successful after the war in the hands of Geoff Sparrowe in club racing.

The old association formed at the very beginning of the Morgan story was revived with the introduction of a Standard engine in 1938. This power unit developed from the 9 hp side valve engine, was specially built for Morgan at the express wish of Sir John Black. The new engine was linked to a Moss gearbox mounted centrally in the chassis and connected to the 5-1 rear axle by a short propeller shaft. The chassis were fitted with rod and cable 8" diameter Girling brakes. Morgan continued to produce three-wheelers (mainly the F4 four-seater and F Super two-seater models) as well as four-wheelers.



Our Four 4 seater

In this period some interesting experiments were made. A Ford 22 horsepower V8 Pilot engine was fitted to the Morgan chassis, which gave a most vivid performance. Due to a taxation increase from 15 shillings to 25 shillings per horsepower, this project was abandoned at the prototype stage. This second experiment was to fit a car with A Anott supercharger. This vehicle, although only

1000 cc. was capable of over 80 mph.

During the Second World War car manufacture ceased and only two departments were retained by the



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Company for repairs. These were the Service shop and the Spares department. The remainder of the factory manufactured a variety of components for the war effort, which included parts for the Oerlikon anti-Aircraft gun, aircraft undercarriage and other precision engineering work.



Assembly of wooden chassis frame

Half way through the war the wood shop and mill was leased to the team developing in-flight refuelling. Sir Alan Cobham, who invented the process, modified a Handley Page "Hereford" Bomber at the factory to take on fuel whilst airborne.

In 1945 many skilled employees came back from the Forces and re-joined the factory. Access to steel was difficult but the fact that the cars could easily be coach-built from aluminium helped Morgan become one of the first British car factories to resume building cars.



Reproduction of original Plus 4 catalogue

Production was restarted with the Four Four fitted with the 1267 cc. Special Standard engine.

In 1947, after being demobilised, P.H.G. Morgan joined the firm as Development Engineer and Draughtsman.

After the Government linked steel supplies directly with the number of export customers so there was increased pressure on the company to export. Distributors were appointed in the USA, Canada, South America, Australia, South Africa and Europe. The Four Four was successful in these markets but the three-wheelers did not enjoy this popularity and the decision to discontinue their production was made in 1950. The last twelve twin cylinder three-wheelers were manufactured in 1946 and shipped to Australia.

In 1947 the announcement by the Standard Motor Co. of their "One Engine Policy" meant that no 1267 cc. Units would be available after 1949 and Morgan found it necessary to consider alternative power units. A prototype was built in 1949 with the Vanguard 1.8 litre engine, which gave a much-increased performance.

1952 - Winning Team of the R.A.C. International Rally.

1950 saw the production of this car as the Plus Four. The engine eventually fitted was the 2088 cc. Vanguard 68 bhp. Unit. The chassis frame was strengthened and a four-speed Moss gearbox and a Salisbury 4-1 rear axle was incorporated.

The Plus Four had immediate success in competition, with Morgan winning the team award in the RAC Rally in 1951 and 1952. H.F.S's son Peter Morgan was a driver in both teams. These rally successes were to be repeated in 1990 when the Plus Four enjoyed a strong revival in classic car rallying.



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1956 - P.H.G Morgan and R.Meredith in final driving test at Hastings during M.C.C. National Rally

Front suspension was also strengthened with longer coil springs giving increased wheel movement. Larger nine-inch diameter hydraulic brakes were fitted. The body styles adopted were an open two-seater, a four seater and a Drophead Coupe. Due to its very high power to weight ratio the Plus Four also began to have many successes on the track.

Lessons learnt from racing were passed on to the production of the car offered to the public and Peter Morgan, the development engineer, regularly drove the cars in competition.

1957 - Plus Fours at Silverstone

In 1954 the radiator was hidden beneath the bodywork to improve aerodynamics and the following year the TR2 engine was fitted, raising the power to 90bhp.



The prototype series Four Four

In 1954 the Morgan Four Four was reintroduced as the Series Two. This was a car of similar design to the Plus Four but fitted with a Ford engine and integral gear box, the object being to provide a sports car of first-class performance and appearance for the enthusiast with modest means.

During 1956 the TR3 engine was fitted to the Plus Four, increasing the power to 100 bhp. When built with lightweight aluminium bodies, these models were extremely fast, capable of covering the standard quarter-mile in 16 seconds. Plus Fours won many production sports car braces, particularly in the USA, where they dominated SCCS. Class D for many years. Lew Spencer was a familiar figure on the winners' rostrum and his car "Baby Doll" built up a huge following. 11 inch disc brakes and knock-on wire wheels were fitted in 1957.

1957 - Plus 4 four-seater touring in Colorado, U.S.A

Morgan owner's clubs expanded their membership throughout the 1950s. This helped make sure damaged cars were rebuilt and helped owners find original spare parts. As they say in America a Morgan may be "totalled" but will never be thrown away. In Britain the Morgan Three-wheeler Club formed by a small band of enthusiasts in 1945 grew in spite of the demise of the three-wheeler. The Morgan Sports Car Club formed in July 1951 with thirty members now claims a membership of over 3000. There are also national Morgan clubs in the USA, Japan, France, Germany, Italy, Holland, Sweden, Switzerland, Spain, Portugal and it is possible to meet a vast network of friends simply by expressing an interest in the Morgan car.



1962 - First at Le Mans in the 2 litre Grand Touring Cars Class.

In 1962 success was achieved again at the 24 hours endurance race at Le Mans. A Plus Four Super Sports prepared by the company and Christopher Lawrence competed and won the 2 litre class. The car was driven by



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Lawrence and Richard Sheppard-Baron and covered a total distance of 2,261 miles at an average speed of 94 mph. Driver changes, refuelling and adjustment took a total of 32 minutes, so the actual running speed of the car was 97 mph. After the race the car was happily driven back to England on public roads.



The Morgan SLR

In 1964 the Morgan chassis was used as the basis for the SLTR, a racing car designed by Chris Lawrence and John Sprinzel. The aerodynamic body gave a top speed far in excess of the 134 mph. Achieved by the Plus Four at Le Mans on the Mulsanne Straight.

1962 marked the introduction of the Four Four Series Five which was fitted with a 1500 cc. ohv. Ford engine in place of the earlier 1340 cc. Unit.

Peter Morgan's daughter, Lady Jane Colwyn, with the Plus Four Plus



The Morgan Plus Four Plus was exhibited at the 1963 Earl's Court Motor Show and was an unexpected addition to the Morgan range. A fully enclosed two-seater, the car used a strengthened Plus Four chassis with the TR4 engine of 2138 cc. Developing 105 bhp. At 4750 rpm. This car was very successful in trials but was considered by the enthusiast not in the Morgan image and production was discontinued within two year after twenty-six cars had been built. However the car proved it was possible to produce an aerodynamic coupe on the Morgan chassis if future customers demanded it.



The Morgan Plus Eight introduced in July 1968

In 1966 the Triumph TR engine was nearing the end of its life and a suitable replacement was sought. The Rover Motor Company offered the forthcoming aluminium Rover V8 engine. Mr Maurice Owen joined the firm to take charge of development on the new car, the Plus Eight, and this model was announced to the public at the Earls Court Motor Show of 1968.

Passenger and driver airbags deployed on the hi-G track at the Motor Industry Research Association

Whilst the Morgan Four Four holds the record for the world's longest production run of the same model, the Plus Eight boasts the longest continuous use of the same power unit in a Morgan. To make this possible there have been regular changes to the specifications over the years. This has ensured that the cars meet modern standards of safety and emissions and are up to date in levels of performance and comfort. In 1970 the Plus Eight gained US type approval after meeting American safety and clean air requirements and in 1978 all Morgan models gained EEC whole vehicle type approval. Further design improvements have been made following experience gained racing and rallying the cars.



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1978 - MMC 11, the works racing Plus Eight competing in the BRDC and BRSCC Production Sports Car Championship

The racing pedigree of the Morgan was enhanced in 1972 and 1975 when Robin Grey driving a Plus Eight won the Fred Dixon Modsports Championship. Chris Alford won the BRSCC Production Sports Car Championship in a Four Four in 1976 and MMC 11, the first production Plus Eight tested by "Autocar" magazine, took the BRDC Production Sports Car Championship in 1978 with nine wins and three seconds in twelve races. This was followed with victory in the BRSCC Production Sports Car Championship in 1979. The drivers were Charles Morgan, the grandson of the founder, and Rob Wells.

1980 - MMC 111, Plus Eight, built by Rob Wells, winner of the Modsports Championship

In the USA Tony Arutunoff won the US National Production Championship in class H and in 1982 both British National Sports Car Championship belonged to Morgan with Steve Cole winning in Prodsports with his ultra lightweight Morgan famous for its one-piece alligator body.

Morgan were prominent in the only 24 hour race held in Britain at this time covering the greatest distance by a single car entry in the Willhire event at Snetterton in 1980, 81 and 82.

80-120 km/h Sportswagen		7.9 s	
Model	Year	0-100 km/h	0-120 km/h
VW Golf	1980	12.5	18.5
VW Golf	1981	12.5	18.5
VW Golf	1982	12.5	18.5
VW Golf	1983	12.5	18.5
VW Golf	1984	12.5	18.5
VW Golf	1985	12.5	18.5
VW Golf	1986	12.5	18.5
VW Golf	1987	12.5	18.5
VW Golf	1988	12.5	18.5
VW Golf	1989	12.5	18.5
VW Golf	1990	12.5	18.5
VW Golf	1991	12.5	18.5
VW Golf	1992	12.5	18.5
VW Golf	1993	12.5	18.5
VW Golf	1994	12.5	18.5
VW Golf	1995	12.5	18.5
VW Golf	1996	12.5	18.5
VW Golf	1997	12.5	18.5
VW Golf	1998	12.5	18.5
VW Golf	1999	12.5	18.5
VW Golf	2000	12.5	18.5
VW Golf	2001	12.5	18.5
VW Golf	2002	12.5	18.5
VW Golf	2003	12.5	18.5
VW Golf	2004	12.5	18.5
VW Golf	2005	12.5	18.5
VW Golf	2006	12.5	18.5
VW Golf	2007	12.5	18.5
VW Golf	2008	12.5	18.5
VW Golf	2009	12.5	18.5
VW Golf	2010	12.5	18.5
VW Golf	2011	12.5	18.5
VW Golf	2012	12.5	18.5
VW Golf	2013	12.5	18.5
VW Golf	2014	12.5	18.5
VW Golf	2015	12.5	18.5
VW Golf	2016	12.5	18.5
VW Golf	2017	12.5	18.5
VW Golf	2018	12.5	18.5
VW Golf	2019	12.5	18.5
VW Golf	2020	12.5	18.5
VW Golf	2021	12.5	18.5
VW Golf	2022	12.5	18.5
VW Golf	2023	12.5	18.5
VW Golf	2024	12.5	18.5
VW Golf	2025	12.5	18.5

The flexibility of the Plus Eight is illustrated by the fact that 80 - 120 kph in fifth gear takes 7.9 seconds

In 1984 fuel injection was fitted to the Plus Eight and over 1200 Morgan's gathered from all over the world at Eastnor Castle to celebrate the 75th Anniversary. In 1989 the capacity of the Plus Eight was increased from 3.5 to 3.9 litres and this ensured that the Plus Eight continued to be one of the fastest accelerating roads cars. The German magazine "Auto Motor und Sport" crowned the Morgan Plus Eight as the fastest car they had ever tested in fifth gear, the world champion for flexibility".

The Plus Four was reintroduced in 1985 with a Fiat engine which was replaced two years later by Rovers award winning lean burn overhead cam 2 litre engine. Charles Morgan, grandson of the founder, joined the company full time in 1985 following a tradition by becoming one of the many third generation Morgan employees. Bruce Stapleton, the London Morgan agent gallantly tried to put the Morgan back amongst the winners in International Sports Car Racing competing with Porsche and Lancia entries in Group 4 and drove a early Plus Eight 12,000 mile to Australia in the London Sydney Marathon setting the fastest time on a number of stages. In the Pirelli Marathon Rick Bourne came second overall in a Morgan Plus Four Super sports and echoed the successes of the Plus Four in the International rallies of the 1950's.

Morgan Race Series - the grid at Silverstone

The Morgan Sports Car Championships began in 1987 as an annual championship designed to give owners the chance to race their cars in a one-make series. The championship grew fast and grids of 309 cars became common. The success of the series prompted a Hillclimb Championship exclusively for Morgan's and encouraged the German Morgan Owners Club to start a race series in Europe called the Continental Morgan Championship. From 1987 to 1993 the Plus Eight of Graham Bryant and Matthew Wurr have consistently shown how fast a Morgan can go against other makes in the 750 Motor Clubs Road sports Series and in Morgan marque racing.

Perhaps this brief history of the Morgan car is best summed up by its inventor, H.F.S. Morgan, who said of his life's work shortly before he died in 1959, "Looking back through the years, seeing both the errors and the



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triumphs in their correct perspective, I feel I have enjoyed it all. The motor trade has been, so far as I am concerned, a most interesting business." This now applies to two further generations of the Morgan family with the interest still sustained by Peter and Charles Morgan.

We hope you have enjoyed this glimpse of how competition success and the efforts of customers and workforce have contributed to the Morgan Legend. Perhaps the reader can now understand why the Morgan has become "The first and last of the Real Sports Cars".

The early 90's saw a rapid series of engine changes. The Ford engine was updated with the 16 valve Zetec in 1992, whilst the M16 Rover engine in the Plus 4 was updated to the T16 specification.

A BBC television programme, entitled "Trouble shooter" caused quite a stir. Industrialist Sir John Harvey Jones visited the factory, and analysed the business. His conclusions were significantly at odds with the views held by the Morgan family, who said so. Even today, many conversations start with reference to the programme, which has entered British folk lore.

His programme had the effect of including hundreds of orders into the factory, and ironically is one of the principal reasons behind the extensive waiting list.

Charles Morgan and dealer Bill Wykeham raced a specifically designed aluminium chassis Plus 8 in 7 rounds of the international 1996 BPR race series which became the FIA GT series in 1997. This car proved that the factory were capable of making and running a successful race car, but also that with the higher performance requirements of this series, the aerodynamics of the existing shape were the major limiting factor to success.

In 1997 the production models were extensively overhauled, with the standardisation of the new Aluminium superform wings (all except the 4/4), longer doors, redesigned facia to allow for airbags the introduction of a 4.6 litre V8 version and generally improved materials throughout.

Production improvements also included a new paint shop, a major investment which uses water based paints.

With output at 11 cars per week from February 1999, the yearly output of the factory had not been greater since before the war.

With the arrival of a standard European Whole Vehicle Approval System, much work was undertaken to ensure all of our cars complied. Most small manufacturers used and still do to this day a low volume exemption. With our reliance on Export markets (approx. 50% of sales) Morgan felt they could not rely on this as a solution.

The expertise gained in this, development of the +8 model for the Federal market and the racing programme provided the backbone to the launch and development of the most exciting new product in the company's history to be launched at the Geneva show on the 29th of February the new car sets the scene for a most interesting part of the company's history.

March 2000 saw the surprise unveil of the all new Aero 8 at the Geneva show. One of the most radical cars on display, it literally stole the show with journalists fighting for press packs at the end of the unveil. Morgan was on the front page of everywhere.

Successes in the US market with the +8, and numerous developments for type approval kept the small but dedicated technical team at Morgan hugely busy. Frontal impact tests, then the more strict 40% offset frontal, side impact, rear impact for the US not to mention Federal emission standards, Euro 3, then Euro 4 which all contrived to keep the company at full tilt just to comply. The last big effort was the engine change and addition of ABS and Airbags for the second development Aero 8 which was launched for the US market at the LA Autoshow and the New York show.



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The +4 ceased production in 2001 when the Rover T16 engine became unavailable from Rover. This model was not re-introduced until September 2004, and continues today fitted with the superb Ford Duratec 2 litre which develops 145 Bhp.

The final +8 was produced in April 2004, stopped only because the Rover V8 would no longer meet the emission standards. Morgan fitted that engine for longer than anyone else, including Rover and Land Rover themselves!! A big party was had at Prescott Hill Climb in Gloucestershire, with over 1000 Morgans in attendance and over 600 runs up the hill. A great day.

How though can you replace an Icon like the +8. With the Roadster of course. With the same body and similar chassis to the outgoing +8, the Roadster benefitted from many years of technological engine development. Using the 3.0 litre engine from the ST220 Mondeo/Jaguar S type this lightweight package offers +20% more power, similar torque and a fabulous rev range. 0-60 takes just 4.9 seconds so the newcomer is faster, more fun and thanks to the lighter engine and better packaging, a better balanced motorcar.

2005 saw the unveiling of the spectacular AeroMax Coupe at the Geneva show. Wowing the crowds with its outrageous looks, this one-off coach-built car used Aero mechanicals clothed in a stunning aluminium coupe. Such was the response, that the Morgan Factory are still considering series production.

So what of 2006. 70 years of the 4/4 that's what! 1936 saw the first 4 wheeled Morgan, and to celebrate the company has announced a run of 142 Morgan 4/4s. 2 of these will each celebrate 1 year of manufacture ie. 1936 will have 2 numbered cars, 1937 etc etc.

With a number of styling cues from yesteryear, including steel wheels with proper hubcaps, fold flat screen, wood rim steering wheel, special instruments and a styled hood, these cars are selling fast. With yet another first, the Morgan website shows actual factory availability of these unique and desirable cars.

For several years, we have missed the 4 seater in the range. We are delighted that the new version has been such a success. Available with both 2 and 3 litre versions, the factory have been building these at the rate of around 2 per week since 2003.

For further information on our full range of cars, please visit our home page



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