

GUMMER CHARLES L
 Form 4
 February 25, 2005

FORM 4

**UNITED STATES SECURITIES AND EXCHANGE COMMISSION
 Washington, D.C. 20549**

OMB APPROVAL

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STATEMENT OF CHANGES IN BENEFICIAL OWNERSHIP OF SECURITIES

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934, Section 17(a) of the Public Utility Holding Company Act of 1935 or Section 30(h) of the Investment Company Act of 1940

(Print or Type Responses)

1. Name and Address of Reporting Person *
 GUMMER CHARLES L

(Last) (First) (Middle)

COMERICA BANK, 1601 ELM ST.

(Street)

DALLAS, TX 75201

(City) (State) (Zip)

2. Issuer Name and Ticker or Trading Symbol
 COMERICA INC /NEW/ [CMA]

3. Date of Earliest Transaction
 (Month/Day/Year)
 02/23/2005

4. If Amendment, Date Original Filed(Month/Day/Year)

5. Relationship of Reporting Person(s) to Issuer

(Check all applicable)

Director 10% Owner
 Officer (give title below) Other (specify below)
 Pres/CEO-Comerica Bank-Tex Div

6. Individual or Joint/Group Filing(Check Applicable Line)
 Form filed by One Reporting Person
 Form filed by More than One Reporting Person

Table I - Non-Derivative Securities Acquired, Disposed of, or Beneficially Owned

1. Title of Security (Instr. 3)	2. Transaction Date (Month/Day/Year)	2A. Deemed Execution Date, if any (Month/Day/Year)	3. Transaction Code (Instr. 8)	4. Securities Acquired (A) or Disposed of (D) (Instr. 3, 4 and 5)	5. Amount of Securities Beneficially Owned Following Reported Transaction(s) (Instr. 3 and 4)	6. Ownership Form: Direct (D) or Indirect (I) (Instr. 4)	7. Nature of Ownership (Instr. 4)
			Code	V	Amount (A) or (D) Price		
Common Stock	02/23/2005		M		6,500 A \$ 18.59	74,460 ⁽¹⁾	D
Common Stock	02/24/2005		S		1,300 D \$ 57.06	73,160 ⁽¹⁾	D
Common Stock	02/24/2005		S		600 D \$ 57.07	72,560 ⁽¹⁾	D
Common Stock	02/24/2005		S		200 D \$ 57.08	72,360 ⁽¹⁾	D
Common Stock	02/24/2005		S		1,400 D \$ 57.09	70,960 ⁽¹⁾	D

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Common Stock	02/24/2005	S	1,800	D	\$ 57.1	69,160 ⁽¹⁾	D	
Common Stock	02/24/2005	S	1,200	D	\$ 57.11	67,960 ⁽¹⁾	D	
Common Stock						1,500	I	by Spouse
Common Stock						5,024 ⁽²⁾	I	by 401(k)

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly.

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Table II - Derivative Securities Acquired, Disposed of, or Beneficially Owned
(e.g., puts, calls, warrants, options, convertible securities)

1. Title of Derivative Security (Instr. 3)	2. Conversion or Exercise Price of Derivative Security	3. Transaction Date (Month/Day/Year)	3A. Deemed Execution Date, if any (Month/Day/Year)	4. Transaction Code (Instr. 8)	5. Number of Derivative Securities Acquired (A) or Disposed of (D) (Instr. 3, 4, and 5)	6. Date Exercisable and Expiration Date (Month/Day/Year)	7. Title and Amount of Underlying Securities (Instr. 3 and 4)	Amount or Number of Shares	
				Code	V (A) (D)	Date Exercisable	Expiration Date	Title	Amount or Number of Shares
Employee Stock Option (right to buy)	\$ 18.59	02/23/2005		M	6,500	01/19/1996 ⁽³⁾ 04/18/2005	Common Stock	6,500	
Employee Stock Option (right to buy)	\$ 25.42					01/17/1997 ⁽³⁾ 04/14/2006	Common Stock	18,000	
Employee Stock Option (right to buy)	\$ 40.25					01/20/1998 ⁽³⁾ 04/20/2007	Common Stock	18,000	
Employee Stock	\$ 71.58					01/15/1999 ⁽³⁾ 03/20/2008	Common Stock	25,000	

Option (right to buy)						
Employee Stock Option (right to buy)	\$ 66.81		01/14/2000 ⁽³⁾	03/19/2009	Common Stock	25,000
Employee Stock Option (right to buy)	\$ 41.5		01/19/2001 ⁽³⁾	03/17/2010	Common Stock	18,000
Employee Stock Option (right to buy)	\$ 51.43		01/22/2002 ⁽³⁾	05/02/2011	Common Stock	15,800
Employee Stock Option (right to buy)	\$ 63.2		01/21/2003 ⁽³⁾	04/17/2012	Common Stock	24,800
Employee Stock Option (right to buy)	\$ 40.32		01/27/2004 ⁽³⁾	04/17/2013	Common Stock	24,500
Employee Stock Option (right to buy)	\$ 52.5		01/26/2005 ⁽³⁾	04/16/2014	Common Stock	25,000

Reporting Owners

Reporting Owner Name / Address	Relationships			
	Director	10% Owner	Officer	Other
GUMMER CHARLES L COMERICA BANK 1601 ELM ST. DALLAS, TX 75201			Pres/CEO-Comerica Bank-Tex Div	

Signatures

/s/ Jon W. Bilstrom, on behalf of Charles L.
Gummer

02/25/2005

__Signature of Reporting Person

Date

Explanation of Responses:

- * If the form is filed by more than one reporting person, *see* Instruction 4(b)(v).
 - ** Intentional misstatements or omissions of facts constitute Federal Criminal Violations. *See* 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).
- (1) This number includes shares purchased under the CMA dividend reinvestment plan and shares acquired through employee stock plans as of January 30, 2005.
 - (2) As of January 30, 2005.
 - (3) The options vest in four equal annual installments beginning on the date indicated in this column.

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, *see* Instruction 6 for procedure.
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