

GUMMER CHARLES L

Form 4

November 02, 2004

FORM 4**UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549**

Check this box
if no longer
subject to
Section 16.
Form 4 or
Form 5
obligations
may continue.
See Instruction
1(b).

**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

OMB APPROVAL

OMB
Number: 3235-0287
Expires: January 31,
2005
Estimated average
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(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)

11/02/2004

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

5. Relationship of Reporting Person(s) to
Issuer

(Check all applicable)

____ Director ____ 10% Owner
__X__ Officer (give title ____ Other (specify
below) below)

Pres/CEO-Comerica Bank-Tex Div

6. Individual or Joint/Group Filing(Check
Applicable Line)

__X__ 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 Indirect Beneficial Ownership (Instr. 4)
Common Stock	11/02/2004		G	V 200 D \$ 0	67,858 ⁽¹⁾	D	
Common Stock					4,973 ⁽²⁾	I	by 401(k)
Common Stock					1,500	I	by Spouse

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

**Persons who respond to the collection of
information contained in this form are not
required to respond unless the form
displays a currently valid OMB control**

SEC 1474
(9-02)

number.

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)	8. Amount or Number of Shares
Employee Stock Option (right to buy)	\$ 18.59					01/19/1996 ⁽³⁾ 04/18/2005	Common Stock	16,500
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 Option (right to buy)	\$ 71.58					01/15/1999 ⁽³⁾ 03/20/2008	Common Stock	25,000
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/ Nicole V. Gersch, on behalf of Charles L.
Gummer 11/02/2004

__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 October 1, 2004.
- (2) As of October 1, 2004.
- (3) The option vests 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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