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COMERICA	A INC /NEW/										
Form 4											
August 24, 2	2005										
FORM 4 UNITED STATES SECURITIES AND EXCHANGE COMMISSION								OMB APPROVAL			
	UNITED	STATES		AITIES A shington,			NGE C	OMMISSION	OMB Number:	3235-0287	
Check th									Expires:	January 31	
if no lon subject to Section Form 4 c	GES IN BENEFICIAL OWNERSHIP OF SECURITIES					Expires. 200 Estimated average burden hours per response 0.					
Form 5 obligatio may con <i>See</i> Instr 1(b).	tinue. Section 17(a	a) of the	Public U		ling Con	ipany	y Act of	e Act of 1934, 1935 or Sectior 0	1		
(Print or Type)	Responses)										
1. Name and A GREENE D	Address of Reporting 2 DALE E	Person <u>*</u>	Symbol	Name and			-	5. Relationship of Issuer			
(Last)	(First) (N	Aiddle)	3. Date of Earliest Transaction (Check						c all applicable)		
	OWARD AVE, 31	ŕ	(Month/D 08/23/20	ay/Year)	ansaction			Director X_Officer (give below) EVP/Chies		Owner er (specify Ofc.	
	(Street)		4. If Ame	ndment, Da	te Origina	l		6. Individual or Jo	int/Group Filin	1g(Check	
DETROIT,	MI 48226		Filed(Mor	nth/Day/Year))			Applicable Line) _X_ Form filed by O Form filed by M	one Reporting Pe	rson	
								Person			
(City)	(State)	(Zip)	Tabl	e I - Non-D	erivative	Secur	ities Acq	uired, Disposed of	, or Beneficial	ly Owned	
1.Title of Security (Instr. 3)	2. Transaction Date (Month/Day/Year)	asaction Date 2A. Deemed (Day/Year) Execution Date, if any (Month/Day/Year)		3. 4. Securities Acquired Transaction(A) or Disposed of (D) Code (Instr. 3, 4 and 5) (Instr. 8)			d of (D)	5. Amount of Securities Beneficially Owned Following Reported	6. Ownership Form: Direct (D) or Indirect (I) (Instr. 4)	Indirect Beneficial	
				Code V	Amount	(A) or (D)	Price	Transaction(s) (Instr. 3 and 4)			
Common Stock	08/23/2005			М	2,750	А	\$ 25.42	61,734 <u>(1)</u>	D		
Common Stock	08/24/2005			S	2,750	D	\$ 60.44	58,984	D		

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. Transact Code (Instr. 8)	tio	Securiti	vative es d d of	6. Date Exercisable and Expiration Date (Month/Day/Year)		7. Title and Amount o Underlying Securities (Instr. 3 and 4)	
				Code V	V	(A)	(D)	Date Exercisable	Expiration Date	Title	Amoun or Number of Share
Employee Stock Option (right to buy)	\$ 25.42	08/23/2005		М		2,750		01/17/1997 <u>(2)</u>	04/14/2006	Common Stock	2,750
Employee Stock Option (right to buy)	\$ 40.25							01/20/1998 <u>(2)</u>	04/20/2007	Common Stock	12,00
Employee Stock Option (right to buy)	\$ 71.58							01/15/1999 <u>(2)</u>	03/20/2008	Common Stock	12,00
Employee Stock Option (right to buy)	\$ 66.81							01/14/2000(2)	03/19/2009	Common Stock	15,00
Employee Stock Option (right to buy)	\$ 41.5							01/19/2001 <u>(2)</u>	03/17/2010	Common Stock	16,22
Employee Stock Option (right to buy)	\$ 51.43							01/22/2002 <u>(2)</u>	05/02/2011	Common Stock	14,50
Employee Stock Option	\$ 63.2							01/21/2003(2)	04/17/2012	Common Stock	23,60

(right to buy)					
Employee Stock Option (right to buy)	\$ 40.32	01/27/2004 <u>(2)</u>	04/17/2013	Common Stock	23,40
Employee Stock Option (right to buy)	\$ 52.5	01/26/2005 <u>(2)</u>	04/16/2014	Common Stock	40,00

Reporting Owners

Reporting Owner Name / Address	Relationships							
	Director	10% Owner	Officer	Other				
GREENE DALE E 500 WOODWARD AVE 31ST FLOOR DETROIT, MI 48226			EVP/Chief Credit Policy Ofc.					
Signatures								
/s/ Robert W. Spencer, on beha Greene	08/24/2005							
<u>**</u> Signature of Reporting Pe	erson		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 August 23, 2005.
- (2) 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. Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB number.