

GUMMER CHARLES L
 Form 4
 April 20, 2007

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)
 04/19/2007

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)

Executive Vice President

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 or Price		
Common Stock	04/19/2007		M		18,000 A \$ 40.25	102,607 ⁽¹⁾	D
Common Stock	04/19/2007		S		400 D \$ 62.27	102,207 ⁽¹⁾	D
Common Stock	04/19/2007		S		500 D \$ 62.26	101,707 ⁽¹⁾	D
Common Stock	04/19/2007		S		100 D \$ 62.25	101,607 ⁽¹⁾	D
Common Stock	04/19/2007		S		700 D \$ 62.19	100,907 ⁽¹⁾	D

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Common Stock	04/19/2007	S	1,333	D	\$ 62.18	99,574 <u>(1)</u>	D
Common Stock	04/19/2007	S	767	D	\$ 62.17	98,807 <u>(1)</u>	D
Common Stock	04/19/2007	S	100	D	\$ 62.16	98,707 <u>(1)</u>	D
Common Stock	04/19/2007	S	100	D	\$ 62.159	98,607 <u>(1)</u>	D
Common Stock	04/19/2007	S	500	D	\$ 62.15	98,107 <u>(1)</u>	D
Common Stock	04/19/2007	S	1,400	D	\$ 62.14	96,707 <u>(1)</u>	D
Common Stock	04/19/2007	S	2,000	D	\$ 62.13	94,707 <u>(1)</u>	D
Common Stock	04/19/2007	S	2,200	D	\$ 62.12	92,507 <u>(1)</u>	D
Common Stock	04/19/2007	S	1,800	D	\$ 62.11	90,707 <u>(1)</u>	D
Common Stock	04/19/2007	S	900	D	\$ 62.1	89,807 <u>(1)</u>	D
Common Stock	04/19/2007	S	600	D	\$ 62.09	89,207 <u>(1)</u>	D
Common Stock	04/19/2007	S	500	D	\$ 62.08	88,707 <u>(1)</u>	D
Common Stock	04/19/2007	S	700	D	\$ 62.07	88,007 <u>(1)</u>	D
Common Stock	04/19/2007	S	343	D	\$ 62.06	87,664 <u>(1)</u>	D
Common Stock	04/19/2007	S	457	D	\$ 62.05	87,207 <u>(1)</u>	D
Common Stock	04/19/2007	S	800	D	\$ 62.04	86,407 <u>(1)</u>	D
Common Stock	04/19/2007	S	400	D	\$ 62.03	86,007 <u>(1)</u>	D
Common Stock	04/19/2007	S	900	D	\$ 62.02	85,107 <u>(1)</u>	D
Common Stock	04/19/2007	S	300	D	\$ 62.01	84,807 <u>(1)</u>	D
Common Stock	04/19/2007	S	200	D	\$ 62	84,607 <u>(1)</u>	D

1,500

I

by Spouse

Common
Stock

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 Security (Instr. 3 and 4)	Amount or Number of Shares
				Code	V (A) (D)	Date Exercisable Expiration Date	Title	
Employee Stock Option (right to buy)	\$ 40.25	04/19/2007		M	18,000	01/20/1998 ⁽²⁾ 04/20/2007	Common Stock	18,000
Employee Stock Option (right to buy)	\$ 71.58					01/15/1999 ⁽²⁾ 03/20/2008	Common Stock	25,000
Employee Stock Option (right to buy)	\$ 66.81					01/14/2000 ⁽²⁾ 03/19/2009	Common Stock	25,000
Employee Stock Option (right to buy)	\$ 41.5					01/19/2001 ⁽²⁾ 03/17/2010	Common Stock	18,000
Employee Stock Option (right to buy)	\$ 51.43					01/22/2002 ⁽²⁾ 05/02/2011	Common Stock	15,800

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) Includes shares acquired through employee stock plans, shares purchased with reinvested dividends and stock units held pursuant to a deferred compensation plan as of April 19, 2007.
- (2) The options vest in four equal annual installments beginning on the date indicated in this column.

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