

Burkhart Megan D
 Form 3
 February 01, 2010

FORM 3 UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

OMB APPROVAL

OMB Number: 3235-0104
 Expires: January 31, 2005
 Estimated average burden hours per response... 0.5

INITIAL STATEMENT OF 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 *		2. Date of Event Requiring Statement	3. Issuer Name and Ticker or Trading Symbol	
Burkhart Megan D		(Month/Day/Year)	COMERICA INC /NEW/ [CMA]	
(Last)	(First)	(Middle)	4. Relationship of Reporting Person(s) to Issuer	5. If Amendment, Date Original Filed(Month/Day/Year)
			(Check all applicable)	
1717 MAIN STREET, MC			___ Director	___ 10% Owner
6515			<input checked="" type="checkbox"/> Officer	___ Other
(Street)			(give title below)	(specify below)
DALLAS, TX 75201			EVP - Chief HR Officer	6. Individual or Joint/Group Filing(Check Applicable Line)
(City)	(State)	(Zip)		<input checked="" type="checkbox"/> Form filed by One Reporting Person
				___ Form filed by More than One Reporting Person

Table I - Non-Derivative Securities Beneficially Owned

1. Title of Security (Instr. 4)	2. Amount of Securities Beneficially Owned (Instr. 4)	3. Ownership Form: Direct (D) or Indirect (I) (Instr. 5)	4. Nature of Indirect Beneficial Ownership (Instr. 5)
Common Stock	3,369	D	

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

SEC 1473 (7-02)

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

1. Title of Derivative Security (Instr. 4)	2. Date Exercisable and Expiration Date (Month/Day/Year)	3. Title and Amount of Securities Underlying Derivative Security (Instr. 4)	4. Conversion or Exercise Price of Derivative Security	5. Ownership Form of Derivative Security: Direct (D)	6. Nature of Indirect Beneficial Ownership (Instr. 5)
	Date Exercisable	Title			

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	Expiration Date	Amount or Number of Shares	or Indirect (I) (Instr. 5)
Employee Stock Option (right to buy)	01/21/2003 ⁽¹⁾ 04/17/2012	Common Stock 1,000 \$ 63.2	D Â
Employee Stock Option (right to buy)	01/26/2005 ⁽¹⁾ 04/16/2014	Common Stock 363 \$ 52.5	D Â
Employee Stock Option (right to buy)	01/25/2006 ⁽¹⁾ 04/21/2015	Common Stock 2,750 \$ 54.99	D Â
Employee Stock Option (right to buy)	01/24/2007 ⁽¹⁾ 02/15/2016	Common Stock 2,200 \$ 56.47	D Â
Employee Stock Option (right to buy)	01/23/2008 ⁽¹⁾ 01/23/2017	Common Stock 3,200 \$ 58.98	D Â
Employee Stock Option (right to buy)	01/22/2009 ⁽¹⁾ 01/22/2018	Common Stock 2,800 \$ 37.45	D Â
Employee Stock Option (right to buy)	01/27/2010 ⁽¹⁾ 01/27/2019	Common Stock 2,800 \$ 17.32	D Â
Employee Stock Option (right to buy)	01/26/2011 ⁽¹⁾ 01/26/2020	Common Stock 15,000 \$ 34.78	D Â

Reporting Owners

Reporting Owner Name / Address	Relationships			
	Director	10% Owner	Officer	Other
Burkhart Megan D 1717 MAIN STREET MC 6515 DALLAS, TX 75201	Â	Â	Â EVP - Chief HR Officer	Â

Signatures

/s/ Nicole V. Gersch on behalf of Megan D. Burkhart 02/01/2010

 **Signature of Reporting Person Date

Explanation of Responses:

- * If the form is filed by more than one reporting person, see Instruction 5(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) 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.