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may commute							OMB Number: Expires: Estimated a burden hou response			
BUTTIGIEG JOSEPH J III Symbol Issuer COMERICA INC /NEW/ [CMA]										
(Last) (First) (Middle) 3. Date o (Month/L			n/Day/Year)				(Cneck all applicable) X Director 10% Owner X Officer (give title Other (specify below) Vice Chairman / Director			
			nth/Day/Year) Applicable Line) _X_ Form filed by One Reporting Person Form filed by More than One Reporting				rson			
(Month/Day/Year)	2A. Deemed Execution Date, any	 3. 4. Securities Acquired Transaction(A) or Disposed of (D) Code (Instr. 3, 4 and 5)) (Instr. 8) 		equired l of (D)	5. Amount of Securities Beneficially Owned Following Reported Transaction(s)	6. 7. Nature of Ownership Indirect Form: Direct Beneficial (D) or Ownership Indirect (I) (Instr. 4) (Instr. 4)				
		Code V	Amount	or (D)	Price	(Instr. 3 and 4)				
07/24/2006		М	18,000	А	\$ 40.25	124,806 <u>(1)</u>	D			
07/24/2006		S	11,000	D	\$ 55.35	113,806 <u>(1)</u>	D			
07/24/2006		S	200	D	\$ 55.36	113,606 <u>(1)</u>	D			
07/24/2006		S	6,800	D	\$ 55.37	106,806 (1)	D			
	6 1 4 UNITED S is box ger 6. T T S S S S S S S S S S S S S	6 4 UNITED STATES SECU is box STATEMENT OF CHARA 6. r rine. Filed pursuant to Section ns Section 17(a) of the Public 30(h) of the Responses) address of Reporting Person [±] 2. Iss G JOSEPH J III Symbol (First) (Middle) 3. Date (Month WARD AVE, 31ST 07/24 (Street) 4. If Al (Street) 2A. Deemed (Month/Day/Year) Execution Date, i any (Month/Day/Year) 07/24/2006 07/24/2006 07/24/2006 07/24/2006	6 4 UNITED STATES SECURITIES A Washington is box STATEMENT OF CHANGES IN 6. 6. SECUR r Filed pursuant to Section 16(a) of the section 17(a) of the Public Utility Hol 30(h) of the Investment Responses) Section 17(a) of the Public Utility Hol Section 17(a) of the Investment Responses) 2. Issuer Name and Symbol COMERICA IN (First) (Middle) 3. Date of Earliest T (Month/Day/Year) (WARD AVE, 31ST 07/24/2006 (Street) 4. If Amendment, D Filed(Month/Day/Year) MI 48226 (Zip) (State) (Zip) (Month/Day/Year) Execution Date, if Transacti any (Month/Day/Year) Execution Date, if (Instr. 8) (Month/Day/Year) Code (Instr. 8) (07/24/2006 S 07/24/2006 S	6 4 UNITED STATES SECURITIES AND EXC Washington, D.C. 20: Washington, D.C. 20: Statement of CHANGES IN BENEFI 6. 6. STATEMENT OF CHANGES IN BENEFI 6. SECURITIES 7 Filed pursuant to Section 16(a) of the Securit inue. Section 17(a) of the Public Utility Holding Con- 30(h) of the Investment Compan Responses) Section 17(a) of the Public Utility Holding Con- 30(h) of the Investment Compan Responses) 2. Issuer Name and Ticker or Symbol COMERICA INC /NEW/ (First) (Middle) 3. Date of Earliest Transaction (Month/Day/Year) WARD AVE, 31ST 07/24/2006 (Street) 4. If Amendment, Date Original Filed(Month/Day/Year) MI 48226 3. 4. Securit (Month/Day/Year) (Month/Day/Year) Execution Date, if Transaction(A) or Di- any Code (Month/Day/Year) (Instr. 3, 4) (Month/Day/Year) (Instr. 3, 4) 07/24/2006 S 11,000 07/24/2006 S 11,000 07/24/2006 S 200	6 4 UNITED STATES SECURITIES AND EXCHANASINGTON, D.C. 20549 is box STATEMENT OF CHANGES IN BENEFICIA 6. SECURITIES 6. SECURITIES 6. SECURITIES 7 Filed pursuant to Section 16(a) of the Securities E nuction Section 17(a) of the Public Utility Holding Company 30(h) of the Investment Company Ac Responses) COMERICA INC /NEW/ [CM G JOSEPH J III Symbol COMERICA INC /NEW/ [CM (First) (Middle) 3. Date of Earliest Transaction (Month/Day/Year) WARD AVE, 31ST 07/24/2006 (Street) 4. If Amendment, Date Original Filed(Month/Day/Year) MI 48226 State (Zip) (State) (Zip) Table I - Non-Derivative Secure (Month/Day/Year) MI 48226 State (Instr. 3, 4 and (Month/Day/Year) (Month/Day/Year) State (Instr. 3, 4 and (Month/Day/Year)) 07/24/2006 M 18,000 07/24/2006 S 11,000 07/24/2006 S 11,000 07/24/2006 S 200 D	6 4 UNITED STATES SECURITIES AND EXCHANGE C Washington, D.C. 20549 is box STATEMENT OF CHANGES IN BENEFICIAL OWN 6. SECURITIES 7 Filed pursuant to Section 16(a) of the Securities Exchange inue. Section 17(a) of the Public Utility Holding Company Act of 194 Section 17(a) of the Public Utility Holding Company Act of 194 Responses) address of Reporting Person 1 2. Issuer Name and Ticker or Trading Symbol COMERICA INC /NEW/ [CMA] (First) (Middle) 3. Date of Earliest Transaction (Month/Day/Year) WARD AVE, 31ST 07/24/2006 (Street) 4. If Amendment, Date Original Filed(Month/Day/Year) MI 48226 (State) 3. 4. Securities Acquired Transaction(A) or Disposed of (D) code (Month/Day/Year) (Month/Day/Year) (Month/Day/Year) (A (Xate) (A) (Instr. 8)	6 4 UNITED STATES SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549 is box STATEMENT OF CHANGES IN BENEFICIAL OWNERSHIP OF 6. r Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934, is intered. Section 17(a) of the Public Utility Holding Company Act of 1935 or Section 30(h) of the Investment Company Act of 1940 Responses) 2. Issuer Name and Ticker or Trading Symbol 5. Relationship of Issuer (diress of Reporting Person 1 2. Issuer Name and Ticker or Trading Symbol 5. Relationship of Issuer (First) (Middle) 3. Date of Earliest Transaction (Month/Day/Year) X			

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. Transactic Code (Instr. 8)	5. Number of orDerivative Securities Acquired (A) or Disposed of (D) (Instr. 3, 4, and 5)	6. Date Exercisal Expiration Date (Month/Day/Yea		7. Title and A Underlying S (Instr. 3 and	Securiti
				Code V	(A) (D)	Date Exercisable	Expiration Date	Title	Amou or Numb of Sha
Employee Stock Option (right to buy)	\$ 40.25	07/24/2006		М	18,000	01/20/1998 <u>(2)</u>	04/20/2007	Common Stock	18,0
Employee Stock Option (right to buy)	\$ 71.58					01/15/1999 <u>(2)</u>	03/20/2008	Common Stock	25,0
Employee Stock Option (right to buy)	\$ 66.81					01/14/2000(2)	03/19/2009	Common Stock	40,0
Employee Stock Option (right to buy)	\$ 41.5					01/19/2001(2)	03/17/2010	Common Stock	75,0
Employee Stock Option (right to buy)	\$ 51.43					01/22/2002(2)	05/02/2011	Common Stock	75,0
Employee Stock Option (right to	\$ 63.2					01/21/2003(2)	04/17/2012	Common Stock	70,0

buy)					
Employee Stock Option (right to buy)	\$ 40.32	01/27/2004 <u>(2)</u>	04/17/2013	Common Stock	68,0
Employee Stock Option (right to buy)	\$ 52.5	01/26/2005 <u>(2)</u>	04/16/2014	Common Stock	75,0
Employee Stock Option (right to buy)	\$ 54.99	01/25/2006 <u>(2)</u>	04/21/2015	Common Stock	75,0
Employee Stock Option (right to buy)	\$ 56.47	02/15/2007 <u>(2)</u>	02/15/2016	Common Stock	50,0

Reporting Owners

Reporting Owner Name / Address			Relationships		
	Director	10% Owner	Officer	Othe	
BUTTIGIEG JOSEPH J III 500 WOODWARD AVE 31ST FLOOR DETROIT, MI 48226	Х		Vice Chairman / Director		
Signatures					
/s/ Robert W. Spencer, Jr., on behalf of Joseph J. Buttigieg, III			07/25/2006		

**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 July 24, 2006.
- (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.