ELENBAAS MARVIN J
Form 4
May 03, 2005

FORM 4

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

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

(Print or Type Responses)

1. Name and Address of Reporting Person *
ELENBAAS MARVIN J

(Last) (First) (Middle)

COMERICA BANK, 411 W. LAFAYETTE

(Street)

DETROIT, MI 48226

(City) (State) (Zip)

2. Issuer Name **and** Ticker or Trading Symbol
COMERICA INC /NEW/ [CMA]

3. Date of Earliest Transaction (Month/Day/Year)
04/21/2005

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 below) _____ Other (specify below)
SVP & Chief Accounting Officer

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)
			Code	V	Amount	(A) or (D)	Price			
Common Stock	04/21/2005		A		760	A	$ 0	20,790 (1)	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. 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)	
				Code	V	(A)	(D)	Date Exercisable	Expiration Date	Title	Amount or Number of Shares
Employee Stock Option (right to buy)	$ 54.99	04/21/2005		A		5,600		01/25/2006(2)	04/21/2015	Common Stock	5,600
Employee Stock Option (right to buy)	$ 25.42							01/17/1997(2)	04/14/2006	Common Stock	3,450
Employee Stock Option (right to buy)	$ 40.25							01/20/1998(2)	04/20/2007	Common Stock	3,600
Employee Stock Option (right to buy)	$ 71.58							01/15/1999(2)	03/20/2008	Common Stock	5,500
Employee Stock Option (right to buy)	$ 66.81							01/14/2000(2)	03/19/2009	Common Stock	5,950
Employee Stock Option (right to buy)	$ 41.5							01/19/2001(2)	03/17/2010	Common Stock	5,950
Employee Stock Option (right to buy)	$ 51.43							01/22/2002(2)	05/02/2011	Common Stock	5,324

Employee Stock Option (right to buy)	$ 63.2		01/21/2003(2)	04/17/2012	Common Stock	6,400
Employee Stock Option (right to buy)	$ 40.32		01/27/2004(2)	04/17/2013	Common Stock	1,900
Employee Stock Option (right to buy)	$ 52.5		01/26/2005(2)	04/16/2014	Common Stock	4,100

Reporting Owners

Reporting Owner Name / Address	Relationships			
	Director	10% Owner	Officer	Other
ELENBAAS MARVIN J COMERICA BANK 411 W. LAFAYETTE DETROIT, MI 48226			SVP & Chief Accounting Officer	

Signatures

/s/ Nicole V. Gersch, on behalf of Marvin J. Elenbaas	05/03/2005
**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 May 3, 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.
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