

Killian John M
 Form 3
 February 10, 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	
K Killian John M		(Month/Day/Year)	COMERICA INC /NEW/ [CMA]	
(Last)	(First)	(Middle)	02/01/2010	
1717 MAIN STREET, MC			4. Relationship of Reporting Person(s) to Issuer	5. If Amendment, Date Original Filed(Month/Day/Year)
6405			(Check all applicable)	
(Street)			<input type="checkbox"/> Director <input type="checkbox"/> 10% Owner	6. Individual or Joint/Group Filing(Check Applicable Line)
DALLAS, TX 75201			<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Form filed by One Reporting Person
(City)	(State)	(Zip)	EVP - Chief Credit Officer	<input type="checkbox"/> 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	23,971	D	K

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)
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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 7,000 \$ 63.2	D Â
Employee Stock Option (right to buy)	01/26/2005 ⁽¹⁾ 04/16/2014	Common Stock 8,000 \$ 52.5	D Â
Employee Stock Option (right to buy)	01/25/2006 ⁽¹⁾ 04/21/2015	Common Stock 11,000 \$ 54.99	D Â
Employee Stock Option (right to buy)	01/24/2007 ⁽¹⁾ 02/15/2016	Common Stock 9,080 \$ 56.47	D Â
Employee Stock Option (right to buy)	01/23/2008 ⁽¹⁾ 01/23/2017	Common Stock 9,500 \$ 58.98	D Â
Employee Stock Option (right to buy)	01/22/2009 ⁽¹⁾ 01/22/2018	Common Stock 10,000 \$ 37.45	D Â
Employee Stock Option (right to buy)	01/27/2010 ⁽¹⁾ 01/27/2019	Common Stock 7,900 \$ 17.32	D Â
Employee Stock Option (right to buy)	01/26/2011 ⁽¹⁾ 01/26/2020	Common Stock 18,000 \$ 34.78	D Â

Reporting Owners

Reporting Owner Name / Address	Relationships			
	Director	10% Owner	Officer	Other
Killian John M 1717 MAIN STREET MC 6405 DALLAS, TX 75201	Â	Â	Â EVP - Chief Credit Officer	Â

Signatures

/s/ Thad A. Schaefer on behalf of John M.
Killian 02/10/2010

__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.