

Ogden Thomas D
 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 *
 Ogden Thomas D

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

5. Relationship of Reporting Person(s) to Issuer

(Check all applicable)

(Last) (First) (Middle)
 500 WOODWARD AVENUE, 31ST FLOOR

3. Date of Earliest Transaction (Month/Day/Year)
 04/19/2007

____ Director
 Officer (give title below)
 ____ 10% Owner
 ____ Other (specify below)
 Executive Vice President

(Street)
 DETROIT, MI 48226

4. If Amendment, Date Original Filed(Month/Day/Year)

6. Individual or Joint/Group Filing(Check Applicable Line)
 Form filed by One Reporting Person
 Form filed by More than One Reporting Person

(City) (State) (Zip)

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) |
|---------------------------------|--------------------------------------|--|--------------------------------|---|---|--|-----------------------------------|
| | | | | (A) or (D) | Price | | |
| Common Stock | 04/19/2007 | | S | D | \$ 63.14 | 20,455 ⁽¹⁾ | D |
| Common Stock | 04/19/2007 | | S | D | \$ 63.13 | 18,455 ⁽¹⁾ | D |
| Common Stock | | | | | | 3,485 | I by Spouse |

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

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number.

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) | 8. Amount or Number of Shares |
|--|--|--------------------------------------|--|--------------------------------|---|--|---|-------------------------------|
| Employee Stock Option (Right to Buy) | \$ 71.58 | | | | | 01/15/1999 ⁽²⁾ 03/20/2008 | Common Stock | 6,375 |
| Employee Stock Option (Right to Buy) | \$ 66.81 | | | | | 01/14/2000 ⁽²⁾ 03/19/2009 | Common Stock | 7,350 |
| Employee Stock Option (Right to Buy) | \$ 41.5 | | | | | 01/19/2001 ⁽²⁾ 03/17/2010 | Common Stock | 8,000 |
| Employee Stock Option (Right to Buy) | \$ 51.43 | | | | | 01/21/2002 ⁽²⁾ 05/02/2011 | Common Stock | 6,600 |
| Employee Stock Option (Right to Buy) | \$ 63.2 | | | | | 01/21/2003 ⁽²⁾ 04/17/2012 | Common Stock | 12,000 |
| Employee Stock Option (Right to Buy) | \$ 40.32 | | | | | 01/27/2004 ⁽²⁾ 04/17/2013 | Common Stock | 11,900 |

| | | | | | |
|--|----------|---------------------------|------------|-----------------|--------|
| Employee Stock Option (Right to Buy) | \$ 52.5 | 01/26/2005 ⁽²⁾ | 04/16/2014 | Common Stock | 8,500 |
| Employee Stock Option (Right to Buy) | \$ 54.99 | 01/25/2006 ⁽²⁾ | 04/21/2015 | Common Stock | 12,000 |
| Employee Stock Option (Right to Buy) | \$ 56.47 | 01/24/2007 ⁽²⁾ | 02/15/2016 | Common Stock | 10,600 |
| Employee Stock Option (Right to Buy) | \$ 58.98 | 01/23/2008 ⁽²⁾ | 01/23/2017 | Common Stock | 12,000 |

Reporting Owners

| Reporting Owner Name / Address | Relationships | | | |
|--|---------------|-----------|--------------------------|-------|
| | Director | 10% Owner | Officer | Other |
| Ogden Thomas D 500 WOODWARD AVENUE 31ST FLOOR DETROIT, MI 48226 | | | Executive Vice President | |

Signatures

| | |
|--|---------------------|
| /s/ Nicole V. Gersch on behalf of Thomas D. Ogden | 04/20/2007 |
| <small>**Signature of Reporting Person</small> | <small>Date</small> |

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.

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.