



ANNUAL USE OF CAPITAL SURVEY - 2009

NAME OF INSTITUTION

(Include Holding Company Where Applicable)

COMERICA INCORPORATED

Person to be contacted regarding this report:	Darlene Persons, Investor Relations
UST Sequence Number:	16
CPP Funds Received:	2,250,000,000
CPP Funds Repaid to Date:	2,250,000,000
Date Funded (first funding):	Nov 14, 2008
Date Repaid ¹ :	Mar 17, 2010

RSSD: (For Bank Holding Companies)	1199844
Holding Company Docket Number: (For Thrift Holding Companies)	N/A
FDIC Certificate Number: (For Depository Institutions)	
City:	Dallas
State:	Texas

¹If repayment was incremental, please enter the most recent repayment date.

American taxpayers are quite interested in knowing how banks have used the money that Treasury has invested under the Capital Purchase Program (CPP). To answer that question, Treasury is seeking responses that describe generally how the CPP investment has affected the operation of your business. We understand that once received, the cash associated with TARP funding is indistinguishable from other cash sources, unless the funds were segregated, and therefore it may not be feasible to identify precisely how the CPP investment was deployed or how many CPP dollars were allocated to each use. Nevertheless, we ask you to provide as much information as you can about how you have used the capital Treasury has provided, and how your uses of that capital have changed over time. Treasury will be pairing this survey with a summary of certain balance sheet and other financial data from your institution's regulatory filings, so to the extent you find it helpful to do so, please feel free to refer to your institution's quarterly call reports to illustrate your answers. This is your opportunity to speak to the taxpayers in your own words, which will be posted on our website.

What specific ways did your institution utilize CPP capital? Check all that apply and elaborate as appropriate, especially if the uses have shifted over time. Your responses should reflect actions taken over the past year (or for the portion of the year in which CPP funds were outstanding).

<input checked="" type="checkbox"/>	Increase lending or reduce lending less than otherwise would have occurred.	After the receipt of CPP funds, management moved away from promoting capital preservation through careful management of loan attrition and toward focused attention on establishing new and renewing existing lending relationships.
<input checked="" type="checkbox"/>	To the extent the funds supported increased lending, please describe the major type of loans, if possible (residential mortgage loans, commercial mortgage loans, small business loans, etc.).	Total new and renewed loan commitments in 2009 were as follows - Commercial and Industrial (including Small Business): \$31 billion, Commercial Real Estate (including Small Business): \$5 billion, Residential Mortgages (first lien): \$470 million, and Home Equity Loans: \$150 million.
<input checked="" type="checkbox"/>	Increase securities purchased (ABS, MBS, etc.).	Comerica supported the residential mortgage market through the purchase of nearly \$5 billion in Mortgage Backed Securities during 2009.

<input type="checkbox"/>	Make other investments	
<input type="checkbox"/>	Increase reserves for non-performing assets	
<input type="checkbox"/>	Reduce borrowings	
<input type="checkbox"/>	Increase charge-offs	
<input type="checkbox"/>	Purchase another financial institution or purchase assets from another financial institution	
<input checked="" type="checkbox"/>	Held as non-leveraged increase to total capital	While Comerica was actively pursuing opportunities to lend to new and existing customers, the economic downturn resulted in a decline in lending across the banking system such that Comerica could not leverage the CPP funds effectively.

What actions were you able to avoid because of the capital infusion of CPP funds?

After the receipt of CPP funds, Comerica's management moved away from promoting capital preservation through careful management of loan attrition and toward focused attention on establishing new and renewing existing lending relationships. Without the CPP funds, Comerica may not have been able to fully initiate new and renewed Commercial and Industrial loan commitments of \$31 billion, Commercial Real Estate loan commitments of \$5 billion, Residential Mortgages (first lien) of \$470 million, and Home Equity loan commitments of \$150 million in 2009. Commercial and Industrial and Commercial Real Estate loan commitments included \$3 billion for Small Business. All of the aforementioned loans were made with the appropriate pricing and credit standards. While the economic recovery appeared to be underway toward the later part of 2009, loan demand remained subdued throughout the year across the entire banking system, including at Comerica.

What actions were you able to take that you may not have taken without the capital infusion of CPP funds?

The receipt of CPP funds supported business initiatives at Comerica including:

- Lending to new and existing customers: With no subprime mortgage programs and a business model focused on business lending, Comerica was able to devote its attention in 2009 to originating new and renewing existing lending relationships, including commercial middle market lending and small business loans, commercial real estate, and residential mortgages.

- Purchasing Mortgage Backed Securities in support of the residential housing market: Comerica has been very active in the Mortgage Backed Securities market, buying close to \$5 billion in 2009.

Comerica recognized total CPP related dividends of \$134 million after tax in 2009, or approximately 89 cents per common share. Clearly, Comerica's participation in the CPP program helped to stabilize the country's financial system at a critical point, and since the CPP funds have now been fully repaid by Comerica, the investment the government made in Comerica resulted in excellent returns for the U.S. taxpayers.

Please describe any other actions that you were able to undertake with the capital infusion of CPP funds.

N/A