TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: COMERICA INCORPORATED | **Submission date: 03/30/2009** | **Person to be contacted about this report: Darlene Persons**

PART I. QUANTITATIVE OVERVIEW

SCHEDULE A: CONSUMER LENDING (Millions $)	2008 DEC	2009 JAN	2009 FEB	Key	Comments
1. First Mortgage					
a. Average Loan Balance (Daily Average Total Outstanding)	$1,843	$1,847	$1,850	Consists of 1st lien 1-4 family residential mortgage and construction loans originated by Comerica Bank.	**First mortgage originations include loans originated and sold to our mortgage partner ($24M Feb '09/$8M Jan '09/$9M Dec '08).**
b. Total Originations	$21	$33	$63	Consists of loans funded during the period, including those originated for sale.	**Feb refinancings increased $30M vs. Jan ($16M increase in Western market, $13M increase in Midwest market, $1M increase in Texas market).**
(1) Refinancings	$15	$21	$51		
(2) New Home Purchases	$6	$12	$12		
2. Home Equity					
a. Average Total Loan Balance	$1,774	$1,782	$1,792	Consists of both fixed and revolving home equity (2nd lien) loans.	**Feb home equity originations increased $6M vs. Jan ($4M increase in Western market, $1M increases in both the Texas and Florida markets, flat in the Midwest).**
b. Originations (New Lines+Line Increases)	$31	$8	$14	Excludes commitments/originations where home equity collateral is provided for multiple purposes (personal and business), which are included in Commercial Lending commitments (Schedule B).	
c. Total Used and Unused Commitments	$3,358	$3,354	$3,349		
3. US Card - Managed					
a. Average Total Loan Balance - Managed	$52	$49	$49	Consists primarily of commercial bankcard loans.	**New account originations include referrals to our consumer card partner ($8M Feb '09/$12M Jan '09/$23M Dec '08).**
b. New Account Originations (Initial Line Amt)	$27	$13	$9	Includes new card loans funded during the period and new referrals to our consumer card partner.	
c. Total Used and Unused Commitments	$418	$404	$400		
4. Other Consumer					
a. Average Total Loan Balance	$805	$748	$735	Consists of consumer installment loans (both secured and unsecured) and student loans.	**Feb other consumer originations increased $6M vs. Jan ($3M increases in both the Midwest and Western markets).**
b. Originations	$57	$17	$23		

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SCHEDULE B: COMMERCIAL LENDING (Millions $)	DEC	JAN	FEB	Key	Comments
1. C & I					
a. Average Total Loan and Lease Balance	$31,373	$30,598	$30,318	Consists of loans for commercial and industrial purposes to both domestic and international borrowers, lease financing and other non-consumer, non-real estate loans.	**Feb new commercial (C & I) commitments increased $4M vs. Jan ($57M increase in the Midwest market, declines of $23M, $21M and $7M in the Western, National/International and Texas markets, respectively). By line of business, there were increases of $53M, $13M and $10M Middle Market, Private Banking and Financial Services Divisions, respectively, and decreases of $32M, $18M, $12M and $11M in Technology & Life Sciences, Specialty Businesses, Commercial Real Estate and International Divisions, respectively.** **C & I renewals in Small Business (generally defined as entities with annual sales under $10M) totaled $108M, a decrease of $2M vs. Jan. New Small Business C & I commitments of $10M increased $2M in Feb.**
b. Renewal of Existing Accounts	$2,216	$786	$1,100	Includes renewals of and increases to lines with existing customers.	
c. New Commitments	$385	$170	$174	Consists of binding commitments to new customers and new lines to existing customers, net of participations sold. Includes commitments/originations where home equity collateral is provided for multiple purposes (personal and business).	
2. Commercial Real Estate					
a. Average Total Loan and Lease Balance	$15,085	$14,957	$14,954	Consists of loans made to businesses where 50% or more of the collateral is real estate (primarily owner-occupied) and loans made to businesses or developers for building construction.	**Feb new commercial real estate (CRE) commitments increased $54M vs. Jan. Commitments increased $57M, $17M and $8M in the National/International, Midwest and Florida markets, respectively, and declined $14M and $12M in the Texas and Western markets, respectively.** **New CRE commitments in Small Business totaled $11M in Feb, an increase of $9M vs. Jan. Small Business CRE renewals totaled $8M in Feb, a decrease of $8M vs Jan.**
b. Renewal of Existing Accounts	$372	$314	$140	Includes renewals of and increases to lines with existing customers.	
c. New Commitments	$133	$84	$138	Consists of binding commitments to new customers and new lines to existing customers, net of participations sold.	
SCHEDULE C: OTHER INTERMEDIATION ACTIVITIES (Millions $)					
1. MBS/ABS Net Purchased Volume					
a. Mortgage Backed Securities	$0	$1,323	$498	Represents purchases (net of sales, if any) of mortgage-backed securities (AAA-rated agency securities) for investment portfolio available-for-sale on a trade date basis. Excludes principal paydowns.	
b. Asset Backed Securities	$17	$0	$0		
2. Secured Lending (Repo, PB, Margin Lending)					
a. Average Total Matched Book (Repo/Reverse Repo)[1]	N/A	N/A	N/A		
b. Average Total Debit Balances[2]	N/A	N/A	N/A		
3. Underwriting					
a. Total Equity Underwriting	$0	$0	$0	Amount of equity securities underwritten where the Corporation was manager or co-manager of the issue. All done on "best efforts" basis.	
b. Total Debt Underwriting	$2,020	$1,758	$3,312	Amount of debt securities underwritten where the Corporation had either a manager or co-manager role. All done on "best efforts" basis.	

Notes:
1. Not applicable if matched book activity does not exceed $50 billion.
2. Applicable only for institutions offering prime brokerage or other margin lending services to clients.

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PART II. QUALITATIVE OVERVIEW

Please provide a brief overview of the intermediation activity during the month. This discussion should include a general commentary on the lending environment, loan demand, any changes in lending standards and terms, and any other intermediation activity.

Comerica Incorporated is a financial services company headquartered in Dallas, Texas. Comerica Incorporated is strategically aligned into three major business segments: the Business Bank, the Retail Bank and Wealth & Institutional Management, and operates in four primary markets: Texas, the Midwest (primarily Michigan), Western (primarily California and Arizona) and Florida.

The principal focus of Comerica Incorporated is to meet the needs of small and medium-sized businesses, multinational corporations and governmental entities through various products and services including loans and lines of credit, letters of credit, deposits, international trade finance and other services. The Business Bank, which includes all business customers except for small business, traditionally accounts for at least two-thirds of net interest income. In addition to serving the needs of businesses, Comerica Incorporated also offers a variety of consumer products, including deposit accounts, installment loans, credit cards, home equity lines of credit and residential mortgage loans. Fiduciary services, private banking, retirement services and other wealth management services are also provided.

Due to deteriorating economic conditions in our markets in early 2008, especially in California and Michigan, Management began a process intended to reduce business loans and commitments to preserve capital and generate appropriate loan pricing for current risks. With the receipt of TARP proceeds, Management's focus moved toward establishing new and expanding existing lending relationships, with appropriate pricing and credit standards, particularly in Small Business, Middle Market and Wealth Management. Comerica Incorporated has historically focused on appropriate and consistent underwriting standards and has not tightened its underwriting standards during the Snapshot reporting periods of October 2008 through February 2009.

Consumer Lending

Overall, consumer lending activity increased in February 2009. Continued low mortgage rates spurred a marked increase in first mortgage application volume and originations, principally in refinancing activity. The increase in refinancing originations occurred primarily in our Western and Midwest markets. February home equity originations increased modestly.

Other consumer lending application volume and originations also increased in February.

In addition to direct consumer residential mortgage activity, residential mortgage lending was also facilitated through lending to commercial customers in our Mortgage Banker (part of Commercial Real

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Estate) and Financial Services Divisions. Renewals and new commitments of $35 million were booked in the Mortgage Banker and Financial Services Divisions in February 2009.

Commercial Lending

Overall, commercial lending activity increased modestly in February 2009. Business customers remained cautious and loan demand continued to reflect distressed economic conditions nationally and in our markets.

C&I lending renewals increased across our three largest markets in February (Midwest, Western and Texas), with the largest increases concentrated in our National Dealer Services division and Middle Market lending. New C&I commitments were relatively flat in February compared to the prior month.

Commercial real estate activity decreased in February, with a significant drop in renewal volume from levels that had been fairly steady for the past several months. New commercial real estate commitments increased in February, largely reflecting higher activity in National Dealer Services.

The Small Business division of Comerica Incorporated focuses on meeting the needs of entities with annual sales of generally less than $10 million at initial relationship. Renewals of commitments in Small Business have been steadily decreasing over the past several months, reflecting decreased demand. New C&I commitments in Small Business increased modestly in February.

Other Intermediation Activities

In February 2009, net mortgage-backed securities of $0.5 billion were purchased. In total, $1.8 billion of net new mortgage-backed securities have been purchased of the $2.0 billion commitment made since receiving TARP Capital Purchase Plan proceeds.

Debt underwriting through our broker/dealer subsidiary during February 2009 of $3.3 billion provided access to liquidity for corporate customers.