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May 7, 2010

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Washington, DC 20549

Edwin Mecabe Managing Director **Corporate Actions and Market Watch**

20 Broad Street, 17th Floor New York, NY 10005 T +1 212 656 5026 F +1 212 656 5893 emecabe@nyx.com

1-10706

Ms. Velma T. Smith **Branch Chief** Securities and Exchange Commission Branch of Filer Support 2 Room 2531 100 F Street, NE Washington, DC 20549

Dear Ms. Smith:

The New York Stock Exchange certifies approval for listing and registration under the Exchange Act of 1933, Comerica Incorporated, Warrants (expiring November 14, 2018). The NYSE requests simultaneous acceleration of registration of the Securities Exchange Act of 1934, together with the 1933 Act. Adequate distribution assured. Form 8-A received on May 7, 2010. Tentative listing date -May 7, 2010

Sincerely.

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