

COMMERCE BANK, N.A.
CAPITAL RATIOS
SEPTEMBER 30, 2006

| | <u>Sept.</u> <u>2006</u> | <u>December</u> <u>2005</u> | <u>December</u> <u>2004</u> |
|-------------------|-----------------------------|--------------------------------|--------------------------------|
| 1. Leverage Ratio | 7.51% | 7.47% | 7.28% |
| 2. Tier I RBC | 8.97% | 9.40% | 9.18% |
| 3. Total RBC | 10.09% | 10.60% | 10.39% |