

COMMERCE BANK, N.A.
CAPITAL RATIOS
31-Mar-05

	March 2005	December 2004	December 2003
1. Leverage Ratio	7.32%	7.28%	7.39%
2. Tier I RBC	9.20%	9.18%	9.20%
3. Total RBC	10.41%	10.39%	10.45%