COMMERCE BANK, N.A. CAPITAL RATIOS SEPTEMBER 30, 2008

		September	December <u>2007</u>	December <u>2006</u>
1.	Leverage Ratio	8.23%	7.96% 7.58	1 %
2.	Tier I RBC	9.48%	9.29% 9.31	%
3.	Total RBC	10.61%	10.29%	10.42%