

COMMERCE BANK, N.A.
CAPITAL RATIOS
SEPTEMBER 30, 2007

| | <u>Sept.</u> <u>2007</u> | <u>December</u> <u>2006</u> | <u>December</u> <u>2005</u> |
|-------------------|-----------------------------|--------------------------------|--------------------------------|
| 1. Leverage Ratio | 8.04% | 7.58% | 7.47% |
| 2. Tier I RBC | 9.33% | 9.31% | 9.40% |
| 3. Total RBC | 10.35% | 10.42% | 10.60% |