



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

October 21, 2011

Via E-mail

James L. Swarts  
Vice President and Secretary  
Commerce Bancshares, Inc.  
1000 Walnut Street  
Kansas City, MO 64106

**Re: Commerce Bancshares, Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2010**  
**Filed February 25, 2011**  
**Form 10-Q for Fiscal Quarter Ended March 31, 2011**  
**Filed May 9, 2011**  
**File No. 000-02989**

Dear Mr. Swarts:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Michael Seaman for

Suzanne Hayes  
Assistant Director