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COMMERCE BANCSHARES INC /MO/
Form 13F-HR
April 28, 2011

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

FORM 13F

FORM 13F COVER PAGE

REPORT FOR THE CALENDAR YEAR OR QUARTER ENDED: 3/31/11

CHECK HERE IF AMENDMENT (); AMENDMENT NUMBER:
THIS AMENDMENT (CHECK ONLY ONE.): () RESTATEMENT.
() ADDS NEW HOLDINGS ENTRIES.

INSTITUTIONAL INVESTMENT MANAGER FILING THIS REPORT:

NAME: COMMERCE BANCSHARES, INC.
ADDRESS: 1000 WALNUT, P.O. BOX 13686
KANSAS CITY, MO 64199

FORM 13F FILE NUMBER: 28-642

THE INSTITUTIONAL INVESTMENT MANAGER FILING THIS REPORT AND THE PERSON BY WHOM IT IS SIGNED HEREBY REPRESENT THAT THE PERSON SIGNING THE REPORT IS AUTHORIZED TO SUBMIT IT, THAT ALL INFORMATION CONTAINED HEREIN IS TRUE, CORRECT AND COMPLETE, AND THAT IT IS UNDERSTOOD THAT ALL REQUIRED ITEMS, STATEMENTS SCHEDULES, LISTS, AND TABLES, ARE CONSIDERED INTEGRAL PARTS OF THIS FORM.

PERSON SIGNING THIS REPORT ON BEHALF OF REPORTING MANAGER:

NAME: JEFFERY D. ABERDEEN
TITLE: CONTROLLER
PHONE: 816-234-2081

SIGNATURE, PLACE, AND DATE OF SIGNING:

JEFFERY D. ABERDEEN KANSAS CITY, MO 4/27/11

REPORT TYPE (CHECK ONLY ONE.):

- () 13F HOLDINGS REPORT
(X) 13F NOTICE
() 13F COMBINATION REPORT

LIST OF OTHER MANAGERS REPORTING FOR THIS MANAGER:
28-05260 COMMERCE BANK, N.A. (MISSOURI)

I AM SIGNING THIS REPORT AS REQUIRED BY THE SECURITIES EXCHANGE ACT OF 1934.