

## FEDERAL RESERVE BANK *of* CLEVELAND

PO Box 6387  
Cleveland, OH 44101-1387  
513.455.4406

Ryan.Schilling@clev.frb.org  
www.clevelandfed.org

December 4, 2025

H. Rodgin Cohen  
Senior Chair  
Sullivan and Cromwell LLP  
125 Broad Street  
New York, New York 10004

RE: The Application by Fifth Third Bancorp and Fifth Third Financial Corporation, both of Cincinnati, Ohio (together “Applicants”), to merge with Comerica Incorporated, Dallas, Texas (“Comerica”), and thereby indirectly acquire Comerica Holdings, Incorporated, Dallas, Texas, and indirectly acquire Comerica Bank, Dallas, Texas, and Comerica Bank & Trust, National Association, Ann Arbor, Michigan (“Comerica Bank & Trust”), pursuant to sections 3(a)(3) and 3(a)(5) of the Bank Holding Company Act of 1956, and sections 225.11 and 225.15 of Regulation Y (hereinafter, “application”).

Dear Mr. Cohen,

Based on staff’s review of the above-referenced application, please provide the following additional information. Supporting documentation should be provided, as appropriate. To the extent the information requested below is not yet available, provide a date by which the requested information is expected to be made available to the Board of Governors of the Federal Reserve System (“Board”).

1. Provide the total trading volume for fixed income, and equities and other securities for Comerica as of September 30, 2025. See the FR Y-15 Report Instructions for calculation, which should match the fields labelled RISKMV93: Trading Volume – fixed income and RISKMV 95: Trading volume – equities and other securities. If none, so state.
2. Discuss Fifth Third’s plans for transitioning the Direct Express prepaid card product from Comerica Bank into Fifth Third Bank. Discuss in detail how this transition would occur and oversight that Fifth Third Bank would put in place to ensure compliance with relevant consumer protection laws and regulations.

Please provide your response, by uploading it to the existing record in FedEZFile within eight business days. Any information for which confidential treatment is desired should be so labeled and separately bound in accordance with section 261.17 of the Board's Rules Regarding Availability of Information, 12 CFR 261.17. A copy of your response should be sent to the OCC. The public portion of your response should be provided to the commenter, Mr. Matthew Lee, at the e-mail address listed below.

Sincerely,

E-SIGNED by Richard Schilling  
on 2025-12-04 14:57:19 EST

R. Ryan Schilling  
Banking Supervisor

cc: Board of Governors of the Federal Reserve System  
Jason Almonte, Office of the Comptroller of the Currency  
Matthew Lee, Fair Finance Watch, email: [lee@fairfinancewatch.org](mailto:lee@fairfinancewatch.org)