COMMERCE BANCSHARES INC /MO/ Form 13F-HR November 10, 2004

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

> > FORM 13F

FORM 13F COVER PAGE

REPORT FOR THE CALENDAR YEAR OR QUARTER ENDED: 9/30/04

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

INSTITUTIONAL INVESTMENT MANAGER FILING THIS REPORT:

NAME :	COMMERCE BANG	CSHARES, 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:	CONTROLI	LΕR	
PHONE:	816-234-	-208	31

SIGNATURE, PLACE, AND DATE OF SIGNING:

JEFFERY D. ABERDEEN KANSAS CITY, MO 11/5/04

REPORT TYPE (CHECK ONLY ONE.):

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

LIST OF OTHER MANAGERS REPORTING FOR THIS MANAGER: 28-05260 COMMERCE BANK, N.A. (MISSOURI) 28-04263 COMMERCE BANK, N.A. (WICHITA, KS)

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

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REPORT SUMMARY:	
NUMBER OF OTHER INCLUDED MANAGERS:	0
FORM 13F INFORMATION TABLE ENTRY TOTAL:	6
FORM 13F INFORMATION TABLE VALUE TOTAL:	\$11,367 (THOUSANDS)
LICT OF OTHER INCLUSER MANAGERS.	

LIST OF OTHER INCLUDED MANAGERS: NONE

FORM 13F INFORMATION TABLE

NAME OF ISSUER	TITLE OF CLASS	CUSIP	VALUE (X1000)	SHARES/ PRN AMT	SH/ PRN	PUT/ CALL	INVSTMT DSCRETN
BRISTOL MYERS SQUIBB CO.	COMMON STOCK	110122108	1420	60000	SH		SOLE
EDWARDS, A.G.	COMMON STOCK	281760108	865	25000	SH		SOLE
JOHNSON AND JOHNSON	COMMON STOCK	478160104	4506	80000	SH		SOLE
MERCK AND CO., INC.	COMMON STOCK	589331107	1320	40000	SH		SOLE
J.P. MORGAN CHASE & CO.	COMMON STOCK	616880100	2963	74575	SH		SOLE
ZIMMER HOLDINGS, INC.	COMMON STOCK	98956P102	293	3701	SH		SOLE