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COMMERCE BANCSHARES INC /MO/
Form 13F-HR
February 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: 12/31/03

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 1/20/04

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)
28-04261 COMMERCE BANK, N.A. (PEORIA, IL)

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

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FORM 13F SUMMARY PAGE

REPORT SUMMARY:

NUMBER OF OTHER INCLUDED MANAGERS: 0

FORM 13F INFORMATION TABLE ENTRY TOTAL: 6

FORM 13F INFORMATION TABLE VALUE TOTAL: \$11,764
(THOUSANDS)

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	1716	60000	SH		SOLE
EDWARDS, A.G.	COMMON STOCK	281760108	906	25000	SH		SOLE
JOHNSON AND JOHNSON	COMMON STOCK	478160104	4133	80000	SH		SOLE
MERCK AND CO., INC.	COMMON STOCK	589331107	1848	40000	SH		SOLE
J.P. MORGAN CHASE & CO.	COMMON STOCK	616880100	2739	74575	SH		SOLE
ZIMMER HOLDINGS, INC.	COMMON STOCK	98956P102	422	6000	SH		SOLE