

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

Mail Stop 4720

March 31, 2010

Mr. Doyle L. Arnold Vice Chairman and Chief Financial Officer Zions Bancorporation One South Main, 15th Floor Salt Lake City, Utah 84133

Re: Zions Bancorporation

Form 10-K for Fiscal Year Ended December 31, 2008

File No. 1-12307

Dear Mr. Arnold,

We have completed our review of your Form 10-K and related filings and have no further comments at this time on the specific issues raised.

Sincerely,

Angela Connell Reviewing Accountant