



DIVISION OF  
CORPORATION FINANCE

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

February 17, 2012

Via E-mail

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, 2010  
Filed March 1, 2011  
File No. 001-12307**

Dear Mr. Arnold:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Angela M. Connell for

Stephanie Hunsaker  
Senior Assistant Chief Accountant