

Mail Stop 4561

September 17, 2008

Gregory A. Smith
Senior Vice President and CFO
Marshall & Ilsley Corporation
770 North Water Street
Milwaukee, Wisconsin 53202

RE: Marshall & Ilsley Corporation
Form 10-K for Fiscal Year Ended December 31, 2007
Form 10-Q for the Fiscal Quarter Ended June 30, 2008
File No. 001-33488

Dear Mr. Smith,

We have completed our review of your Form 10-K and Form 10-Q and have no further comments at this time.

Sincerely,

Kevin W. Vaughn
Accounting Branch Chief