



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 4561

November 19, 2008

Dennis E. Nixon  
President  
International Bancshares Corporation  
1200 San Bernardo Avenue  
Laredo, Texas 78042-1359

**Re: International Bancshares Corporation  
Amendment No. 1 to Preliminary Proxy Statement on Schedule 14A  
Filed November 12, 2008  
File No. 000-09439**

Dear Mr. Nixon:

We have completed our review of your Preliminary Proxy Statement on Schedule 14A and have no further comments at this time.

Sincerely,

William Friar  
Senior Financial Analyst