

April 28, 2006

Mail Stop 4561

Mr. Richard W. Evans, Jr.  
Chief Executive Officer  
Cullen/Frost Bankers, Inc.  
100 West Houston Street  
San Antonio, TX 78205

**Re: Cullen/Frost Bankers, Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2005**  
**Filed February 3, 2006**  
**File Number: 001-13221**

Dear Mr. Evans:

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

Sincerely,

Amit Pande  
Assistant Chief Accountant