

Mail Stop 4561

January 3, 2008

Mr. Phillip D. Green
Group Executive Vice President and Chief Financial Officer
Cullen/Frost Bankers, Inc.
100 W. Houston Street
San Antonio, TX 78205

Re: Cullen/Frost Bankers, Inc.
Form 10-K for the Fiscal Year Ended December 31, 2006
File No. 001-13221

Dear Mr. Green:

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

Sincerely,

John P. Nolan
Accounting Branch Chief