



DIVISION OF  
CORPORATION FINANCE

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

July 28, 2010

*Via U.S. Mail and Facsimile*

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 Fiscal Year Ended December 31, 2009**  
**Filed February 2, 2010**  
**File No. 001-13221**

Dear Mr. Green:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Justin T. Dobbie  
Attorney-Adviser

cc: Stan McCormick  
*Cullen/Frost Bankers, Inc.*