



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

DIVISION OF
CORPORATION FINANCE

February 2, 2011

Mr. Dwight O. Seegmiller
President and Chief Executive Officer
Hills Bancorporation
131 Main Street
Hills, Iowa 52235

Re: Hills Bancorporation
Form 10-K for Fiscal Year Ended December 31, 2009
Filed March 10, 2010
Form 10-Q for Fiscal Quarter Ended March 31, 2010
Filed May 7, 2010
Schedule 14A, filed March 19, 2010
File No. 000-12668

Dear Mr. Seegmiller:

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

Sincerely,

Michael R. Clampitt
Senior Attorney