

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

June 18, 2013

Via E-mail
Alexander J. Hume
Controller
Zions Bancorporation
One South Main, 15th Floor
Salt Lake City, Utah 84133

Re: Zions Bancorporation

Form 10-K for Fiscal Year Ended December 31, 2011

Filed February 29, 2012

Form 10-K for Fiscal Year Ended December 31, 2012

Filed February 28, 2013 File No. 001-12307

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Dear Mr. Hume:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Suzanne Hayes Suzanne Hayes Assistant Director