

Sep-30-03 03:38pm From:
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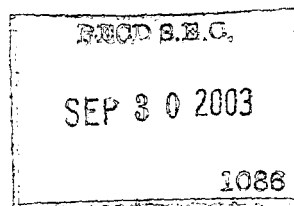
September 30, 2003

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THOMSON
FINANCIAL

Mr. Brian Johnson
Branch Chief
Securities and Exchange Commission
Branch of Filer Support 2
Room 1004 -- STOP/1-4
450 Fifth Street, NW
Judiciary Plaza
Washington, DC 20549



Dear Ms. Hughes:

The New York Stock Exchange certifies approval for listing and registration under the Securities Exchange Act of 1934, ZIONS BANCORPORATION, 6.00% Subordinated Notes due September 15, 2015 and requests immediate acceleration of registration. Adequate distribution assured. Form 8-A received on September 30, 2003. Tentative listing date – October 2, 2003.

Sincerely,

Paras Maano