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September 22, 2010

Russell G. Golden Technical Director Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116

File Reference: No. 1810-100 Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities

Dear Mr. Golden:

WesBanco is a \$5.4 billion financial services company providing retail banking, corporate banking, mortgage banking, trust and investments, insurance and consumer finance services. We appreciate the opportunity to comment on the exposure draft Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities (the "proposal").

WesBanco supports the FASB's efforts to develop a comprehensive framework to address the accounting for financial instruments while reducing the complexity in accounting for those instruments. However, we have deep concerns and are opposed to the portion of the proposal that requires all financial instruments to be marked to fair value as the primary balance sheet measurement. Our most significant concern is that we do not believe the use of fair value for loans, which management intends to hold for investment, is supported by a majority of investors or analysts and in our opinion will not provide "decision-useful" information to users of financial reports, nor will it "reduce the complexity" in accounting for those instruments. Instead, we believe fair value measurement of loans will cloud transparency, exponentially increase volatility in earnings and capital levels, and possibly force banks to become more restrictive in their lending and offer fewer options to their customers.

WesBanco currently has seven sell-side investment analysts providing research coverage for WesBanco's current and potential future retail and institutional investors. During our quarterly earnings reviews with these analysts, they have never questioned the fair value disclosures noted in our footnotes, or questioned Level 3 valuations for those assets carried at fair value on the balance sheet. Also, during our investor presentations at various conferences, we have never had a question about fiar values either for those assets carried at such value or in the footnote disclosures. We also

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conduct annual shareholder meetings each year and during the question and answer period we have also never had a question about asset valuations. We believe that these investors and analysts are knowledgeable in WesBanco's business model and they do not believe market or fair value information for loans is relevant to their investment in WesBanco. Informal discussions we have had with these types of knowledgeable investors indicate to us that most investors do not believe fair value accounting will improve the transparency of banks' business models and operating results.

Another serious concern we have is that this proposal to mark loans to fair value does not reflect a bank's business model. Requiring banks to recognize loans at fair value could result in a change in their business models. The proposal will create increased volatility in bank earnings that is not representative of the operations of the bank. This will put pressure on banks to reduce the volatility, and, in many cases, this may result in a shift in the traditional banking model, or result in limiting products to those that are more sheltered from market volatility. Some management teams may decide to manage their banks in order to reduce quarterly earnings and capital volatility rather than for the long-term benefit of shareholders. This appears to be an illogical and unintended result that could substantially reduce total available credit, with possible adverse consequences for the economy as a whole. We believe that in times of economic stress, the resultant decline in bank capital levels will reduce credit availability just at the time the economy needs increased levels of credit. accounting for loans should not be driving the business model. In addition, volatility in earnings could also diminish the ability of the banking industry to attract new capital and could increase the cost of that capital.

In your proposal, banks must record loans on the balance sheet at their fair value. We believe investors are interested in how loans perform, not how the market views loan performance. Although we respect and support an effort to reduce complexity in accounting for financial instruments, we believe the focus on marking to fair value is not relevant for loans that are not being sold. The market value does not represent the cash the bank will receive. Furthermore, with individualized payment terms, collateralization, and guarantee structures, the vast majority of commercial bank loans have no reliable market in which they could be sold, further calling into question the reliability of using fair value as the basis for financial statements.

We understand that a loan's intrinsic value may change because of current interest rates or because of credit issues the borrower may experience. But if there is a problem in repayment, the banks' typical process is to work the problem out with the borrower rather than sell the loan. Even if it were relatively easy to find a market value, that market value is irrelevant, since the bank would typically not sell the loan. As a

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result of your proposal, bank capital will be affected by market swings that cannot reasonably be expected to ever be realized by the bank.

The individualized nature of the terms of various loans and the lack of an active market for loans will cause banks to make highly subjective estimates of fair value resulting in inconsistent presentations that no two organizations will perform the same way. The wide variations in loan fair value can be seen today in the financial statement footnote disclosures among banks with similar loan portfolios, which in many cases yield very different fair values. This may be primarily due to differing methods of valuation and the necessity of using significant estimates and assumptions, which diminish the relevance and reliability, and comparability and consistency of the information. It also exposes earnings and capital levels to manipulation due to the wide range of possible fair values. In addition, variability of measurement can result in an unlevel playing field among banks.

Additionally, we are very concerned about the costs and resources that will need to be dedicated to accurately produce and audit such data. We have learned from the recent financial crisis that markets are sometimes illiquid and sometimes irrational. Because banks do not use fair values in managing their cash flows, we anticipate that this could require banks to hire more staff and/or consultants to assist with estimating fair values and to pay significantly higher audit fees. These additional costs will not provide the financial statement reader a clearer understanding of the true financial position or operating results of the organization.

With this in mind, we recommend the FASB concentrate efforts to converge your concepts with the IASB fair value concepts, which emphasize bank business models as one of the primary factors in determining whether or not loans should be carried at fair value or historical cost, as adjusted for deferred loan fees and costs or purchase accounting marks, on banks' balance sheets.

Thank you for considering our views. Please feel free to contact us if you would like to discuss our concerns.

Sincerely,

Paul M. Limbert

President and Chief Executive Officer