# PAC-Bayes-Empirical-Bernstein Inequality

*Full Version Including Appendices*

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## Abstract

We present a PAC-Bayes-Empirical-Bernstein inequality. The inequality is based on a combination of the PAC-Bayesian bounding technique with an Empirical Bernstein bound. We show that when the empirical variance is significantly smaller than the empirical loss the PAC-Bayes-Empirical-Bernstein inequality is significantly tighter than the PAC-Bayes-kl inequality of Seeger (2002) and otherwise it is comparable. Our theoretical analysis is confirmed empirically on a synthetic example and several UCI datasets. The PAC-Bayes-Empirical-Bernstein inequality is an interesting example of an application of the PAC-Bayesian bounding technique to self-bounding functions.

## 1 Introduction

PAC-Bayesian analysis is a general and powerful tool for data-dependent analysis in machine learning. By now it has been applied in such diverse areas as supervised learning [\[1](#page-7-0)[–4\]](#page-8-0), unsupervised learning [\[4,](#page-8-0) [5\]](#page-8-1), and reinforcement learning [\[6\]](#page-8-2). PAC-Bayesian analysis combines the best aspects of PAC learning and Bayesian learning: (1) it provides strict generalization guarantees (like VCtheory), (2) it is flexible and allows the incorporation of prior knowledge (like Bayesian learning), and (3) it provides data-dependent generalization guarantees (akin to Radamacher complexities).

PAC-Bayesian analysis provides concentration inequalities for the divergence between expected and empirical loss of randomized prediction rules. For a hypothesis space  $H$  a randomized prediction rule associated with a distribution  $\rho$  over H operates by picking a hypothesis at random according to  $\rho$  from H each time it has to make a prediction. If  $\rho$  is a delta-distribution we recover classical prediction rules that pick a single hypothesis  $h \in \mathcal{H}$ . Otherwise, the prediction strategy resembles Bayesian prediction from the posterior distribution, with a distinction that  $\rho$  does not have to be the Bayes posterior. Importantly, many of PAC-Bayesian inequalities hold for all posterior distributions  $\rho$  simultaneously (with high probability over a random draw of a training set). Therefore, PAC-Bayesian bounds can be used in two ways. Ideally, we prefer to derive new algorithms that find the posterior distribution  $\rho$  that minimizes the PAC-Bayesian bound on the expected loss. However, we can also use PAC-Bayesian bounds in order to estimate the expected loss of posterior distributions  $\rho$ that were found by other algorithms, such as empirical risk minimization, regularized empirical risk minimization, Bayesian posteriors, and so forth. In such applications PAC-Bayesian bounds can be used to provide generalization guarantees for other methods and can be applied as a substitute for cross-validation in paratemer tuning (since the bounds hold for all posterior distributions  $\rho$  simultaneously, we can apply the bounds to test multiple posterior distributions  $\rho$  without suffering from over-fitting, in contrast with extensive applications of cross-validation).

There are two forms of PAC-Bayesian inequalities that are currently known to be the tightest depending on a situation. One is the PAC-Bayes-kl inequality of Seeger [\[7\]](#page-8-3) and the other is the PAC-Bayes-Bernstein inequality of Seldin et. al. [\[8\]](#page-8-4). However, the PAC-Bayes-Bernstein inequality is expressed in terms of the true expected variance, which is rarely accessible in practice. Therefore, in order to apply the PAC-Bayes-Bernstein inequality we need an upper bound on the expected variance (or, more precisely, on the average of the expected variances of losses of each hypothesis  $h \in \mathcal{H}$ weighted according to the randomized prediction rule  $\rho$ ). If the loss is bounded in the [0, 1] interval the expected variance can be upper bounded by the expected loss and this bound can be used to recover the PAC-Bayes-kl inequality from the PAC-Bayes-Bernstein inequality (with slightly suboptimal constants and suboptimal behavior for small sample sizes). In fact, for the binary loss this result cannot be significantly improved (see Section [3\)](#page-3-0). However, when the loss is not binary it may be possible to obtain a tighter bound on the variance, which will lead to a tighter bound on the loss than the PAC-Bayes-kl inequality. For example, in Seldin et. al. [\[6\]](#page-8-2) a deterministic upper bound on the variance of importance-weighted sampling combined with PAC-Bayes-Bernstein inequality yielded an order of magnitude improvement relative to application of PAC-Bayes-kl inequality to the same problem. We note that the bound on the variance used by Seldin et. al. [\[6\]](#page-8-2) depends on specific properties of importance-weighted sampling and does not apply to other problems.

In this work we derive the PAC-Bayes-Empirical-Bernstein bound, in which the expected average variance of the loss weighted by  $\rho$  is replaced by the weighted average of the empirical variance of the loss. Bounding the expected variance by the empirical variance is generally tighter than bounding it by the empirical loss. Therefore, the PAC-Bayes-Empirical-Bernstein bound is generally tighter than the PAC-Bayes-kl bound, although the exact comparison also depends on the divergence between the posterior and the prior and the sample size. In Section [5](#page-5-0) we provide an empirical comparison of the two bounds on several synthetic and UCI datasets.

The PAC-Bayes-Empirical-Bernstein bound is derived in two steps. In the first step we combine the PAC-Bayesian bounding technique with the Empirical Bernstein inequality [\[9\]](#page-8-5) and derive a PAC-Bayesian bound on the variance. The PAC-Bayesian bound on the variance bounds the divergence between averages [weighted by  $\rho$ ] of expected and empirical variances of the losses of hypotheses in H and holds with high probability for all averaging distributions  $\rho$  simultaneously. In the second step the PAC-Bayesian bound on the variance is substituted into the PAC-Bayes-Bernstein inequality yielding the PAC-Bayes-Empirical-Bernstein bound.

The remainder of the paper is organized as follows. We start with some formal definitions and review the major PAC-Bayesian bounds in Section [2,](#page-1-0) provide our main results in Section [3](#page-3-0) and their proof sketches in Section [4,](#page-4-0) and finish with experiments in Section [5](#page-5-0) and conclusions in Section [6.](#page-7-1) Detailed proofs are provided in the supplementary material.

# <span id="page-1-0"></span>2 Problem Setting and Background

We start with providing the problem setting and then give some background on PAC-Bayesian analysis.

## 2.1 Notations and Definitions

We consider supervised learning setting with an input space  $\mathcal{X}$ , an output space  $\mathcal{Y}$ , an i.i.d. training sample  $S = \{ (X_i, Y_i) \}_{i=1}^n$  drawn according to an unknown distribution D on the product-space  $\mathcal{X} \times \mathcal{Y}$ , a loss function  $\ell \colon \mathcal{Y}^2 \to [0,1]$ , and a hypothesis class H. The elements of H are functions  $h: \mathcal{X} \to \mathcal{Y}$  from the input space to the output space. We use  $\ell_h(X, Y) = \ell(Y, h(X))$  to denote the loss of a hypothesis h on a pair  $(X, Y)$ .

For a fixed hypothesis  $h \in \mathcal{H}$  denote its expected loss by  $L(h) = \mathbb{E}_{(X,Y)\sim \mathcal{D}}[\ell_h(X,Y)],$ the empirical loss  $L_n(h) = \frac{1}{n} \sum_{i=1}^n \ell_h(X_i, Y_i)$ , and the variance of the loss  $\mathbb{V}(h) =$  $Var_{(X,Y)\sim\mathcal{D}}[\ell_h(X,Y)] = \mathbb{E}_{(X,Y)\sim\mathcal{D}}\left[\left(\ell_h(X,Y) - \mathbb{E}_{(X,Y)\sim\mathcal{D}}[\ell_h(X,Y)]\right)^2\right].$ 

We define Gibbs regression rule  $G_\rho$  associated with a distribution  $\rho$  over H in the following way: for each point X Gibbs regression rule draws a hypothesis h according to  $\rho$  and applies it to X. The expected loss of Gibbs regression rule is denoted by  $L(G_\rho) = \mathbb{E}_{h \sim \rho}[L(h)]$  and the empirical loss is denoted by  $L_n(G_\rho) = \mathbb{E}_{h \sim \rho}[L_n(h)]$ . We use  $\text{KL}(\rho \| \pi) = \mathbb{E}_{h \sim \rho}\left[\ln \frac{\rho(h)}{\pi(h)}\right]$  to denote the Kullback-Leibler divergence between two probability distributions [\[10\]](#page-8-6). For two Bernoulli distributions with biases p and q we use  $\text{kl}(q||p)$  as a shorthand for  $\text{KL}([q, 1 - q] || [p, 1 - p])$ . In the sequel we use  $\mathbb{E}_{\rho}[\cdot]$  as a shorthand for  $\mathbb{E}_{h \sim \rho}[\cdot]$ .

### 2.2 PAC-Bayes-kl bound

Before presenting our results we review several existing PAC-Bayesian bounds. The result in Theorem [1](#page-2-0) was presented by Maurer [\[11,](#page-8-7) Theorem 5] and is one of the tightest known concentration bounds on the expected loss of Gibbs regression rule. Theorem [1](#page-2-0) generalizes (and slightly tightens) PAC-Bayes-kl inequality of Seeger [\[7,](#page-8-3) Theorem 1] from binary to arbitrary loss functions bounded in the [0, 1] interval.

<span id="page-2-0"></span>**Theorem 1.** For any fixed probability distribution  $\pi$  over H, for any  $n > 8$  and  $\delta > 0$ , with *probability greater than* 1 − δ *over a random draw of a sample* S*, for all distributions* ρ *over* H *simultaneously:* √

<span id="page-2-1"></span>
$$
kl\big(L_n(G_\rho)\|L(G_\rho)\big) \le \frac{KL(\rho\|\pi) + \ln\frac{2\sqrt{n}}{\delta}}{n}.\tag{1}
$$

Since by Pinsker's inequality  $|p - q| \leq \sqrt{k l (q || p) / 2}$ , Theorem [1](#page-2-0) directly implies (up to minor factors) the more explicit PAC-Bayesian bound of McAllester [\[12\]](#page-8-8):

<span id="page-2-2"></span>
$$
L(G_{\rho}) \le L_n(G_{\rho}) + \sqrt{\frac{\text{KL}(\rho || \pi) + \ln \frac{2\sqrt{n}}{\delta}}{2n}},\tag{2}
$$

which holds with probability greater than  $1 - \delta$  for all  $\rho$  simultaneously. We note that kl is easy to invert numerically and for small values of  $L_n(G_\rho)$  (less than  $1/4$ ) the implicit bound in [\(1\)](#page-2-1) is significantly tighter than the explicit bound in [\(2\)](#page-2-2). This can be seen from another relaxation suggested by McAllester [\[2\]](#page-7-2), which follows from [\(1\)](#page-2-1) by the inequality  $p \leq q + \sqrt{2q k l(q||p)} +$  $2kl(q||p)$  for  $p < q$ :

<span id="page-2-3"></span>
$$
L(G_{\rho}) \le L_n(G_{\rho}) + \sqrt{\frac{2L_n(G_{\rho})\left(\text{KL}(\rho||\pi) + \ln\frac{2\sqrt{n}}{\delta}\right)}{n}} + \frac{2\left(\text{KL}(\rho||\pi) + \ln\frac{2\sqrt{n}}{\delta}\right)}{n}.
$$
 (3)

From inequality [\(3\)](#page-2-3) we clearly see that inequality [\(1\)](#page-2-1) achieves "fast convergence rate" or, in other words, when  $L(G_\rho)$  is zero (or small compared to  $1/\sqrt{n}$ ) the bound converges at the rate of  $1/n$ rather than  $1/\sqrt{n}$  as a function of *n*.

#### 2.3 PAC-Bayes-Bernstein Bound

Seldin et. al. [\[8\]](#page-8-4) introduced a general technique for combining PAC-Bayesian analysis with concentration of measure inequalities and derived the PAC-Bayes-Bernstein bound cited below. (The PAC-Bayes-Bernstein bound of Seldin et. al. holds for martingale sequences, but for simplicity in this paper we restrict ourselves to i.i.d. variables.)

<span id="page-2-4"></span>**Theorem 2.** *For any fixed distribution*  $\pi$  *over* H, for any  $\delta_1 > 0$ , and for any fixed  $c_1 > 1$ , with *probability greater than*  $1 - \delta_1$  *(over a draw of S)* we have

$$
L(G_{\rho}) \le L_n(G_{\rho}) + (1+c_1) \sqrt{\frac{(e-2)\mathbb{E}_{\rho}[\mathbb{V}(h)]\left(KL(\rho||\pi) + \ln \frac{\nu_1}{\delta_1}\right)}{n}}
$$
(4)

*simultaneously for all distributions* ρ *over* H *that satisfy*

$$
\sqrt{\frac{\mathrm{KL}(\rho\|\pi)+\ln\frac{\nu_1}{\delta_1}}{(e-2)\mathrm{E}_{\rho}[\mathbb{V}(h)]}} \leq \sqrt{n},
$$

*where*

$$
\nu_1 = \left\lceil \frac{1}{\ln c_1} \ln \left( \sqrt{\frac{(e-2)n}{4 \ln(1/\delta_1)}} \right) \right\rceil + 1,
$$

*and for all other* ρ *we have:*

$$
L(G_{\rho}) \le L_n(G_{\rho}) + 2 \frac{\mathrm{KL}(\rho || \pi) + \ln \frac{\nu_1}{\delta_1}}{n}.
$$

*Furthermore, the result holds if*  $\mathbb{E}_{\rho}[\mathbb{V}(h)]$  *is replaced by an upper bound*  $\mathbb{V}(\rho)$ *, as long as*  $\mathbb{E}_{\rho}\left[\mathbb{V}(h)\right] \leq \bar{V}(\rho) \leq \frac{1}{4}$  for all  $\rho$ .

A few comments on Theorem [2](#page-2-4) are in place here. First, we note that Seldin et. al. worked with cumulative losses and variances, whereas we work with normalized losses and variances, which means that their losses and variances differ by a multiplicative factor of  $n$  from our definitions. Second, we note that the statement on the possibility of replacing  $\mathbb{E}_{\rho}[\mathbb{V}(h)]$  by an upper bound is not part of [\[8,](#page-8-4) Theorem 8], but it is mentioned and analyzed explicitly in the text. The requirement that  $\bar{V}(\rho) \leq \frac{1}{4}$  is not mentioned explicitly, but it follows directly from the necessity to preserve the relevant range of the trade-off parameter  $\lambda$  in the proof of the theorem. Since  $\frac{1}{4}$  is a trivial upper bound on the variance of a random variable bounded in the  $[0, 1]$  interval, the requirement is not a limitation. Finally, we note that since we are working with "one-sided" variables (namely, the loss is bounded in the [0, 1] interval rather than "two-sided" [−1, 1] interval, which was considered in [\[8\]](#page-8-4)) the variance is bounded by  $\frac{1}{4}$  (rather than 1), which leads to a slight improvement in the value of  $\nu_1$ .

Since in reality we rarely have access to the expected variance  $\mathbb{E}_{\rho}[\mathbb{V}(h)]$  the tightness of Theorem [2](#page-2-4) entirely depends on the tightness of the upper bound  $\bar{V}(\rho)$ . If we use the trivial upper bound  $\mathbb{E}_{\rho}[\mathbb{V}(h)] \leq \frac{1}{4}$  the result is roughly equivalent to [\(2\)](#page-2-2), which is inferior to Theorem [1.](#page-2-0) Design of a tighter upper bound on  $\mathbb{E}_{\rho}[\mathbb{V}(h)]$  that holds for all  $\rho$  simultaneously is the subject of the following section.

## <span id="page-3-0"></span>3 Main Results

The key result of our paper is a PAC-Bayesian bound on the average expected variance  $\mathbb{E}_{\rho}[\mathbb{V}(h)]$ given in terms of the average empirical variance  $\mathbb{E}_{\rho}[\mathbb{V}_n(h)] = \mathbb{E}_{h \sim \rho}[\mathbb{V}_n(h)]$ , where

$$
\mathbb{V}_n(h) = \frac{1}{n-1} \sum_{i=1}^n \bigl( \ell_h(X_i, Y_i) - L_n(h) \bigr)^2 \tag{5}
$$

is an unbiased estimate of the variance  $\mathbb{V}(h)$ . The bound is given in Theorem [3](#page-3-1) and it holds with high probability for all distributions  $\rho$  simultaneously. Substitution of this bound into Theorem [2](#page-2-4) yields the PAC-Bayes-Empirical-Bernstein inequality given in Theorem [4.](#page-4-1) Thus, the PAC-Bayes-Empirical-Bernstein inequality is based on two subsequent applications of the PAC-Bayesian bounding technique.

#### 3.1 PAC-Bayesian bound on the variance

Theorem [3](#page-3-1) is based on an application of the PAC-Bayesian bounding technique to the difference  $\mathbb{E}_{q}[\mathbb{V}(h)] - \mathbb{E}_{q}[\mathbb{V}_{n}(h)]$ . We note that  $\mathbb{V}_{n}(h)$  is a second-order U-statistics [\[13\]](#page-8-9) and Theorem [3](#page-3-1) provides an interesting example of combining PAC-Bayesian analysis with concentration inequalities for self-bounding functions.

<span id="page-3-1"></span>**Theorem 3.** *For any fixed distribution*  $\pi$  *over* H, *any*  $c_2 > 1$  *and*  $\delta_2 > 0$ *, with probability greater than*  $1 - \delta_2$  *over a draw of S, for all distributions*  $\rho$  *over*  $H$  *simultaneously:* 

<span id="page-3-2"></span>
$$
\mathbb{E}_{\rho}[\mathbb{V}(h)] \leq \mathbb{E}_{\rho}[\mathbb{V}_n(h)] + (1+c_2) \sqrt{\frac{\mathbb{E}_{\rho}[\mathbb{V}_n(h)] \left( \text{KL}(\rho \|\pi) + \ln \frac{\nu_2}{\delta_2} \right)}{2(n-1)}} + \frac{2c_2 \left( \text{KL}(\rho \|\pi) + \ln \frac{\nu_2}{\delta_2} \right)}{n-1},\tag{6}
$$

*where*

$$
\nu_2 = \left\lceil \frac{1}{\ln c_2} \ln \left( \frac{1}{2} \sqrt{\frac{n-1}{\ln(1/\delta_2)} + 1} + \frac{1}{2} \right) \right\rceil.
$$

Note that [\(6\)](#page-3-2) closely resembles the explicit bound on  $L(G_{\rho})$  in [\(3\)](#page-2-3). If the empirical variance  $\mathbb{V}_n(h)$ is close to zero the impact of the second term of the bound (that scales with  $1/\sqrt{n}$ ) is relatively small and we obtain "fast convergence rate" of  $\mathbb{E}_{\rho}[\mathbb{V}_n(h)]$  to  $\mathbb{E}_{\rho}[\mathbb{V}(h)]$ . Finally, we note that the impact of  $c_2$  on  $\ln \nu_2$  is relatively small and so  $c_2$  can be taken very close to 1.

#### 3.2 PAC-Bayes-Empirical-Bernstein bound

Theorem [3](#page-3-1) controls the average variance  $\mathbb{E}_{\rho}[\mathbb{V}(h)]$  for all posterior distributions  $\rho$  simultaneously. By taking  $\delta_1 = \delta_2 = \frac{\delta}{2}$  we have the claims of Theorems [2](#page-2-4) and [3](#page-3-1) holding simultaneously with probability greater than  $1 - \delta$ . Substitution of the bound on  $\mathbb{E}_{\rho} [\mathbb{V}(h)]$  from Theorem [3](#page-3-1) into the PAC-Bayes-Bernstein inequality in Theorem [2](#page-2-4) yields the main result of our paper, the PAC-Bayes-Empirical-Bernstein inequality, that controls the loss of Gibbs regression rule  $\mathbb{E}_{\rho}[L(h)]$  for all posterior distributions  $\rho$  simultaneously.

<span id="page-4-1"></span>**Theorem 4.** Let  $V_n(\rho)$  denote the right hand side of [\(6\)](#page-3-2) (with  $\delta_2 = \frac{\delta}{2}$ ) and let  $\bar{V}_n(\rho)$  =  $\min (V_n(\rho), \frac{1}{4})$ *. For any fixed distribution*  $\pi$  *over*  $\mathcal{H}$ *, for any*  $\delta > 0$ *, and for any*  $c_1, c_2 > 1$ *, with probability greater than*  $1 - \delta$  *(over a draw of S)* we have:

<span id="page-4-3"></span>
$$
L(G_{\rho}) \le L_n(G_{\rho}) + (1+c_1) \sqrt{\frac{(e-2)\bar{V}_n(\rho)\left(\text{KL}(\rho||\pi) + \ln\frac{2\nu_1}{\delta}\right)}{n}} \tag{7}
$$

*simultaneously for all distributions* ρ *over* H *that satisfy*

$$
\sqrt{\frac{\text{KL}(\rho||\pi) + \ln \frac{2\nu_1}{\delta}}{(e-2)\bar{V}_n(\rho)}} \leq \sqrt{n},
$$

*where*  $\nu_1$  *was defined in Theorem* [2](#page-2-4) (*with*  $\delta_1 = \frac{\delta}{2}$ *), and for all other*  $\rho$  *we have:* 

$$
L(G_{\rho}) \le L_n(G_{\rho}) + 2\frac{\mathrm{KL}(\rho||\pi) + \ln \frac{2\nu_1}{\delta}}{n}.
$$

Note that all the quantities in Theorem [4](#page-4-1) are computable based on the sample.

As we can see immediately by comparing the  $O(1/\sqrt{n})$  term in PAC-Bayes-Empirical-Bernstein inequality (PB-EB for brevity) with the corresponding term in the relaxed version of the PAC-Bayeskl inequality (PB-kl for brevity) in equation [\(3\)](#page-2-3), the PB-EB inequality can potentially be tighter when  $\mathbb{E}_{\rho} [\mathbb{V}_n(h)] \leq (1/(2(e-2))) L_n(G_{\rho}) \approx 0.7 L_n(G_{\rho}).$  We also note that when the loss is bounded in the [0,1] interval we have  $\mathbb{V}_n(h) \le (n/(n-1))L_n(h)$  (since  $\ell_h(X, Y)^2 \le \ell_h(X, Y)$ ). Therefore, the PB-EB bound is never much worse than the PB-kl bound and if the empirical variance is small compared to the empirical loss it can be much tighter. We note that for the binary loss  $(\ell(y, y') \in \{0, 1\})$  we have  $\mathbb{V}(h) = L(h)(1 - L(h))$  and in this case the empirical variance cannot be significantly smaller than the empirical loss and PB-EB does not provide an advantage over PB-kl. We also note that the unrelaxed version of the PB-kl inequality in equation [\(1\)](#page-2-1) has better behavior for very small sample sizes and in such cases PB-kl can be tighter than PB-EB even when the empirical variance is small. To summarize the discussion, when  $\mathbb{E}_{\rho} [\mathbb{V}_n(h)] \leq 0.7L_n(G_{\rho})$  the PB-EB inequality can be significantly tighter than the PB-kl bound and otherwise it is comparable (except for very small sample sizes). In Section [5](#page-5-0) we provide a more detailed numerical comparison of the two inequalities.

## <span id="page-4-0"></span>4 Proofs

In this section we present a sketch of a proof of Theorem [3](#page-3-1) and a proof of Theorem [4.](#page-4-1) Full details of the proof of Theorem [3](#page-3-1) are provided in the supplementary material. The proof of Theorem [3](#page-3-1) is based on the following lemma, which is at the base of all PAC-Bayesian theorems. (Since we could not find a reference, where the lemma is stated explicitly its proof is provided in the supplementary material.)

<span id="page-4-4"></span>**Lemma 1.** For any function  $f_n$ :  $\mathcal{H} \times (\mathcal{X} \times \mathcal{Y})^n \to \mathbb{R}$  and for any distribution  $\pi$  over  $\mathcal{H}$ , such *that*  $\pi$  *is independent of* S, with probability greater than  $1 - \delta$  over a random draw of S, for all *distributions* ρ *over* H *simultaneously:*

<span id="page-4-2"></span>
$$
\mathbb{E}_{\rho}\left[f_n(h,S)\right] \leq \mathrm{KL}(\rho \| \pi) + \ln \frac{1}{\delta} + \ln \mathbb{E}_{\pi}\left[\mathbb{E}_{S' \sim \mathcal{D}^n}\left[e^{f_n(h,S')}\right]\right].\tag{8}
$$

The smart part is to choose  $f_n(h, S)$  so that we get the quantities of interest on the left hand side of [\(8\)](#page-4-2) and at the same time are able to bound the last term on the right hand side of [\(8\)](#page-4-2). Bounding



<span id="page-5-2"></span>Figure 1: The Ratio of the gap between PB-EB and  $L_n(G_p)$  to the gap between PB-kl and  $L_n(G_p)$ for different values of n,  $\mathbb{E}_{\rho}[\mathbb{V}_n(h)]$ , and  $L_n(G_{\rho})$ . PB-EB is tighter below the dashed line with label 1. The axes of the graphs are in log scale.

of the moment generating function (the last term in [\(8\)](#page-4-2)) is usually done by involving some known concentration of measure results. In the proof of Theorem [3](#page-3-1) we use the fact that  $n \mathbb{V}_n(h)$  satisfies the *self-bounding property* [\[14\]](#page-8-10). Specifically, for any  $\lambda > 0$ :

<span id="page-5-1"></span>
$$
\mathbb{E}_{S \sim \mathcal{D}^n} \left[ e^{\lambda(n \mathbb{V}(h) - n \mathbb{V}_n(h)) - \frac{\lambda^2}{2} \frac{n^2}{n-1} \mathbb{V}(h)} \right] \le 1 \tag{9}
$$

(see, for example, [\[9,](#page-8-5) Theorem 10]). We take  $f_n(h, S) = \lambda (n \mathbb{V}(h) - n \mathbb{V}_n(h)) - \frac{\lambda^2}{2}$  $\frac{\lambda^2}{2} \frac{n^2}{n-1} \mathbb{V}(h)$ and substitute  $f_n$  and the bound on its moment generating function in [\(9\)](#page-5-1) into [\(8\)](#page-4-2). To complete the proof it is left to optimize the bound with respect to  $\lambda$ . Since it is impossible to minimize the bound simultaneously for all  $\rho$  with a single value of  $\lambda$ , we follow the technique suggested by Seldin et. al. and take a grid of  $\lambda$ -s in a form of a geometric progression and apply a union bound over this grid. Then, for each  $\rho$  we pick a value of  $\lambda$  from the grid, which is the closest to the value of  $\lambda$  that minimizes the bound for the corresponding  $\rho$ . (The approximation of the optimal  $\lambda$  by the closest  $\lambda$ from the grid is behind the factor  $c_2$  in the bound and the ln  $\nu_2$  factor is the result of the union bound over the grid of  $\lambda$ -s.) Technical details of the derivation are provided in the supplementary material.

*Proof of Theorem [4.](#page-4-1)* By our choice of  $\delta_1 = \delta_2 = \frac{\delta}{2}$  the upper bounds of Theorems [2](#page-2-4) and [3](#page-3-1) hold simultaneously with probability greater than  $1 - \delta$ . Therefore, with probability greater than  $1 - \delta_2$ we have  $\mathbb{E}_{\rho} [\check{V}(h)] \leq \overline{V}_n(h) \leq \frac{1}{4}$  and the result follows by Theorem [2.](#page-2-4)  $\Box$ 

## <span id="page-5-0"></span>5 Experiments

Before presenting the experiments we present a general comparison of the behavior of the PB-EB and PB-kl bounds as a function of  $L_n(G_p)$ ,  $\mathbb{E}_p[\mathbb{V}_n(h)]$ , and n. In Figure [1.](#page-5-2)a and 1.b we examine the ratio of the complexity parts of the two bounds

$$
\frac{\text{PB-EB} - L_n(G_\rho)}{\text{PB-kl} - L_n(G_\rho)},
$$

where PB-EB is used to denote the value of the PB-EB bound in equation [\(7\)](#page-4-3) and PB-kl is used to denote the value of the PB-kl bound in equation [\(1\)](#page-2-1). The ratio is presented in the  $L_n(G_\rho)$  by  $\mathbb{E}_{\rho}[\mathbb{V}_n(h)]$  plane for two values of n. In the illustrative comparison we took  $KL(\rho||\pi) = 18$  and in all the experiments presented in this section we take  $c_1 = c_2 = 1.15$  and  $\delta = 0.05$ . As we wrote in the discussion of Theorem [4,](#page-4-1) PB-EB is never much worse than PB-kl and when  $\mathbb{E}_{\rho} [\mathbb{V}_n(h)] \ll$  $L_n(G_\rho)$  it can be significantly tighter. In the illustrative comparison in Figure [1,](#page-5-2) in the worst case the ratio is slightly above 2.5 and in the best case it is slightly above 0.3. We note that as the sample

size grows the worst case ratio decreases (asymptotically down to 1.2) and the improvement of the best case ratio is unlimited.

As we already said, the advantage of the PB-EB inequality over the PB-kl inequality is most prominent in regression (for classification with zero-one loss it is roughly comparable to PB-kl). Below we provide regression experiments with  $L_1$  loss on synthetic data and three datasets from the UCI repository [\[15\]](#page-8-11). We use the PB-EB and PB-kl bounds to bound the loss of a regularized empirical risk minimization algorithm. In all our experiments the inputs  $X_i$  lie in a d-dimensional unit ball centered at the origin ( $||X_i||_2 \le 1$ ) and the outputs Y take values in [−0.5, 0.5]. The hypothesis class  $\mathcal{H}_W$  is defined as

$$
\mathcal{H}_W = \Big\{h_{\boldsymbol{w}}(X) = \langle \boldsymbol{w}, X \rangle : \boldsymbol{w} \in \mathbb{R}^d, ||\boldsymbol{w}||_2 \leq 0.5 \Big\}.
$$

This construction ensures that the  $L_1$  regression loss  $\ell(y, y') = |y - y'|$  is bounded in the [0, 1] interval. We use uniform prior distribution over  $\mathcal{H}_W$  defined by  $\pi(\boldsymbol{w}) = (V(1/2, d))^{-1}$ , where  $V(r, d)$  is the volume of a d-dimensional ball with radius r. The posterior distribution  $\rho_{\hat{w}}$  is taken to be a uniform distribution on a d-dimensional ball of radius  $\epsilon$  centered at the weight vector  $\hat{w}$ , where  $\hat{w}$  is the solution of the following minimization problem:

<span id="page-6-0"></span>
$$
\hat{\boldsymbol{w}} = \arg\min_{\boldsymbol{w}} \frac{1}{n} \sum_{i=1}^{n} |Y_i - \langle \boldsymbol{w}, X_i \rangle| + \lambda^* ||\boldsymbol{w}||_2^2.
$$
 (10)

Note that [\(10\)](#page-6-0) is a quadratic program and can be solved by various numerical solvers (we used Matlab quadprog). The role of the regularization parameter  $\lambda^* \|w\|_2^2$  is to ensure that the posterior distribution is supported by  $\mathcal{H}_W$ . We use binary search in order to find the minimal (non-negative)  $\lambda^*$ , such that the posterior  $\rho_{\hat{w}}$  is supported by  $\mathcal{H}_W$  (meaning that the ball of radius  $\epsilon$  around  $\hat{w}$  is within the ball of radius 0.5 around the origin). In all the experiments below we used  $\epsilon = 0.05$ .

#### 5.1 Synthetic data

Our synthetic datasets are produced as follows. We take inputs  $X_1, \ldots, X_n$  uniformly distributed in a d-dimensional unit ball centered at the origin. Then we define

$$
Y_i = \sigma_0 \left( 50 \cdot \langle \boldsymbol{w}_0, X_i \rangle \right) + \epsilon_i
$$

with weight vector  $w_0 \in \mathbb{R}^d$ , centred sigmoid function  $\sigma_0(z) = \frac{1}{1+e^{-z}} - 0.5$  which takes values in  $[-0.5, 0.5]$ , and noise  $\epsilon_i$  independent of  $X_i$  and uniformly distributed in  $[-a_i, a_i]$  with

$$
a_i = \begin{cases} \min(0.1, 0.5 - \sigma_0(50 \cdot \langle \boldsymbol{w}_0, X_i \rangle)), & \text{for } \sigma_0(50 \cdot \langle \boldsymbol{w}_0, X_i \rangle) \ge 0; \\ \min(0.1, 0.5 + \sigma_0(50 \cdot \langle \boldsymbol{w}_0, X_i \rangle)), & \text{for } \sigma_0(50 \cdot \langle \boldsymbol{w}_0, X_i \rangle) < 0. \end{cases}
$$

This design ensures that  $Y_i \in [-0.5, 0.5]$ . The sigmoid function creates a mismatch between the data generating distribution and the linear hypothesis class. Together with relatively small level of the noise ( $\epsilon_i \leq 0.1$ ) this results in small empirical variance of the loss  $\mathbb{V}_n(h)$  and medium to high empirical loss  $L_n(h)$ . Let us denote the j-th coordinate of a vector  $u \in \mathbb{R}^d$  by  $u^j$  and the number of nonzero coordinates of u by  $||u||_0$ . We choose the weight vector  $w_0$  to have only a few nonzero coordinates and consider two settings. In the first setting  $d \in \{2, 5\}$ ,  $||w_0||_0 = 2$ ,  $w_0^1 = 0.12$ , and  $w_0^2 = -0.04$  and in the second setting  $d \in \{3, 6\}$ ,  $||\mathbf{w}_0||_0 = 3$ ,  $|\mathbf{w}_0|^2 = -0.08$ ,  $|\mathbf{w}_0|^2 = 0.05$ , and  $w_0^3 = 0.2$ .

For each sample size ranging from 300 to 4000 we averaged the bounds over 10 randomly generated datasets. The results are presented in Figure [2.](#page-7-3) We see that except for very small sample sizes  $(n < 1000)$  the PB-EB bound outperforms the PB-kl bound. Inferior performance for very small sample sizes is a result of domination of the  $O(1/n)$  term in the PB-EB bound [\(7\)](#page-4-3). As soon as n gets large enough this term significantly decreases and PB-EB dominates PB-kl.

#### 5.2 UCI datasets

We compare our PAC-Bayes-Empirical-Bernstein inequality [\(7\)](#page-4-3) with the PAC-Bayes-kl inequality [\(1\)](#page-2-1) on three UCI regression datasets: Wine Quality, Parkinsons Telemonitoring, and Concrete Compressive Strength. For each dataset we centred and normalised both outputs and inputs so that  $Y_i \in [-0.5, 0.5]$  and  $||X_i|| \leq 1$ . The results for 5-fold train-test split of the data together with basic descriptions of the datasets are presented in Table [1.](#page-7-4)



<span id="page-7-3"></span>Figure 2: The values of the PAC-Bayes-kl and PAC-Bayes-Empirical-Bernstein bounds together with the test and train errors on synthetic data. The values are averaged over the 10 random draws of training and test sets.

<span id="page-7-4"></span>Table 1: Results for the UCI datasets

<b>Dataset</b>	$\it n$		Train	Test	<b>PB-kl bound</b>	<b>PB-EB</b> bound
winequality	6497		$0.106 \pm 0.0005$	$0.106 + 0.0022$	$0.175 + 0.0006$	$0.162 \pm 0.0006$
parkinsons	5875	16	$0.188 + 0.0014$	$0.188 + 0.0055$	$0.266 + 0.0013$	$0.250 \pm 0.0012$
concrete	1030		$0.110 \pm 0.0008$	$0.111 + 0.0038$	$0.242 \pm 0.0010$	$0.264 + 0.0011$

## <span id="page-7-1"></span>6 Conclusions and future work

We derived a new PAC-Bayesian bound that controls the convergence of averages of empirical variances of losses of hypotheses in H to averages of expected variances of losses of hypothesis in H simultaneously for all averaging distributions  $\rho$ . This bound is an interesting example of combination of PAC-Bayesian bounding technique with concentration inequalities for self-bounding functions. We applied the bound to derive the PAC-Bayes-Empirical-Bernstein inequality which is a powerful Bernstein-type inequality outperforming the state-of-the-art PAC-Bayes-kl inequality of Seeger [\[7\]](#page-8-3) in situations, where the empirical variance is smaller than the empirical loss and otherwise comparable to PAC-Bayes-kl. We also demonstrated an empirical advantage of the new PAC-Bayes-Empirical-Bernstein inequality over the PAC-Bayes-kl inequality on several synthetic and real-life regression datasets.

Our work opens a number of interesting directions for future research. One of the most important of them is to derive algorithms that will directly minimize the PAC-Bayes-Empirical-Bernstein bound. Another interesting direction would be to decrease the last term in the bound in Theorem [3,](#page-3-1) as it is done in the PAC-Bayes-kl inequality. This can probably be achieved by deriving a PAC-Bayes-kl inequality for the variance.

#### Acknowledgments

The authors are thankful to Anton Osokin for useful discussions and to the anonymous reviewers for their comments. This research was supported by an Australian Research Council Australian Laureate Fellowship (FL110100281) and a Russian Foundation for Basic Research grants 13-07- 00677, 14-07-00847.

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# A Proof of Theorem [3](#page-3-1)

First, we are going to use the so-called *self-bounding* property [\[14\]](#page-8-10) of the random variable  $\mathbb{V}_n(h)$  to derive a tight bound on the moment generating function of the difference  $\mathbb{V}(h) - \mathbb{V}_n(h)$ . It is done by using the following result which is an intermediate step in the proof of a concentration inequality for self-bounding functions presented in [\[16,](#page-8-12) Theorem 13]. The result is given in the forth line before the end of the proof of [\[16,](#page-8-12) Theorem 13].

**Theorem 5.** Let  $X = (X_1, \ldots, X_n)$  be a vector of independent random variables with values in *some set* X. For  $1 \leq k \leq n$  *and*  $x \in \mathcal{X}$ *, we will write*  $\mathbf{X}_{k,x}$  *to denote the vector obtained from* X *by replacing*  $X_k$  *by* x. Suppose that  $a \geq 1$  and that  $Z = \overline{Z(X)}$  is a random variable  $Z : \mathring{X}^n \to \mathbb{R}$ *that satisfies*

<span id="page-8-13"></span>
$$
\forall k: Z(\mathbf{X}) - \inf_{x \in \mathcal{X}} Z(\mathbf{X}_{k,x}) \le 1,\tag{11}
$$

$$
\sum_{k=1}^{n} \big(Z(\boldsymbol{X}) - \inf_{x \in \mathcal{X}} Z(\boldsymbol{X}_{k,x})\big)^2 \le aZ(\boldsymbol{X})
$$
\n(12)

*almost surely. Then for*  $s > 0$ 

<span id="page-8-15"></span><span id="page-8-14"></span>
$$
\mathbb{E}\left[e^{s(\mathbb{E}[Z]-Z)}\right] \le e^{as^2\mathbb{E}[Z]/2}.\tag{13}
$$

We will also need the following simple result:

<span id="page-9-1"></span>**Lemma 2.** *For any finite sequence of real numbers*  $\{x_1, \ldots, x_n\}$  *the following holds:* 

$$
\frac{1}{n(n-1)}\sum_{1\leq i
$$

*Proof.*

$$
\frac{1}{n-1} \sum_{i=1}^{n} \left( x_i - \frac{1}{n} \sum_{j=1}^{n} x_j \right)^2 = \frac{1}{n-1} \sum_{i=1}^{n} \left( x_i^2 - \frac{2}{n} x_i \sum_{j=1}^{n} x_j + \frac{1}{n^2} \left( \sum_{j=1}^{n} x_j \right)^2 \right)
$$

$$
= \frac{1}{n-1} \left( \sum_{i=1}^{n} x_i^2 - \frac{2}{n} \sum_{i=1}^{n} x_i \sum_{j=1}^{n} x_j + \frac{1}{n^2} \sum_{i=1}^{n} \left( \sum_{j=1}^{n} x_j \right)^2 \right)
$$

$$
= \frac{1}{n-1} \left( \sum_{i=1}^{n} x_i^2 - \frac{1}{n} \left( \sum_{j=1}^{n} x_j \right)^2 \right)
$$

$$
= \frac{1}{n(n-1)} \left( (n-1) \sum_{i=1}^{n} x_i^2 - 2 \sum_{1 \le i < j \le n} x_i x_j \right)
$$

$$
= \frac{1}{n(n-1)} \sum_{1 \le i < j \le n} (x_i - x_j)^2.
$$

*Proof of Theorem [3.](#page-3-1)* It is proved in [\[9,](#page-8-5) Theorem 10] that the random variable  $n \mathbb{V}_n(h)$  satisfies con-ditions [\(11\)](#page-8-13) and [\(12\)](#page-8-14) with  $a = \frac{n}{n-1}$ . Hence, by [\(13\)](#page-8-15) for any  $\lambda > 0$  we obtain

$$
\mathbb{E}\left[e^{\lambda(n\mathbb{V}(h)-n\mathbb{V}_n(h))}\right] \leq e^{\frac{\lambda^2}{2}\frac{n^2}{n-1}\mathbb{V}(h)}
$$

or, equivalently,

$$
\mathbb{E}\left[e^{\lambda(n\mathbb{V}(h)-n\mathbb{V}_n(h))-\frac{\lambda^2}{2}\frac{n^2}{n-1}\mathbb{V}(h)}\right] \le 1,\tag{14}
$$

 $\Box$ 

which is a bound on the moment generating function of the random variable

$$
\Phi_{\lambda}(h) = \lambda n \left( 1 - \frac{\lambda n}{2(n-1)} \right) \mathbb{V}(h) - \lambda n \mathbb{V}_n(h).
$$

By substituting  $\Phi_{\lambda}(h)$  into Lemma [1](#page-4-4) we obtain that for  $\pi$  that is independent of the data, with probability greater than  $1 - \delta$  for all distributions  $\rho$  simultaneously:

$$
\mathbb{E}_{\rho}[\Phi_{\lambda}(h)] \leq \mathrm{KL}(\rho \| \pi) + \ln \frac{1}{\delta},
$$

or

$$
\left(1 - \frac{\lambda n}{2(n-1)}\right) \mathbb{E}_{\rho}[\mathbb{V}(h)] \leq \mathbb{E}_{\rho}[\mathbb{V}_n(h)] + \frac{\mathrm{KL}(\rho||\pi) + \ln\frac{1}{\delta}}{\lambda n}.
$$

By assuming that  $\lambda \leq \frac{2(n-1)}{n}$  $\frac{n^{(n-1)}}{n}$  and dividing both sides of the inequality by  $1 - \frac{\lambda n}{2(n-1)}$  we obtain:

<span id="page-9-0"></span>
$$
\mathbb{E}_{\rho}[\mathbb{V}(h)] \le \frac{\mathbb{E}_{\rho}[\mathbb{V}_n(h)]}{\left(1 - \frac{\lambda n}{2(n-1)}\right)} + \frac{\mathrm{KL}(\rho \| \pi) + \ln \frac{1}{\delta}}{\lambda n \left(1 - \frac{\lambda n}{2(n-1)}\right)}.
$$
\n(15)

Note that the right hand side of [\(15\)](#page-9-0) cannot be minimized simultaneously for all  $\rho$  by a single value of  $\lambda$ . In the remainder of the proof we first find the optimal value of  $\lambda$  that minimizes [\(15\)](#page-9-0) and then design a grid of  $\lambda$ -s in a form of a geometric progression and approximate the optimal  $\lambda$  by the nearest  $\lambda$  from the grid. This bounding technique is inspired by [\[8\]](#page-8-4).

Let us introduce the following notations:

$$
t = \frac{\lambda n}{2(n-1)}, \quad a = \mathbb{E}_{\rho}[\mathbb{V}_n(h)], \quad b = \frac{\text{KL}(\rho || \pi) + \ln \frac{1}{\delta}}{2(n-1)}.
$$
 (16)

Then we can rewrite [\(15\)](#page-9-0) as:

<span id="page-10-1"></span>
$$
\mathbb{E}_{\rho}[\mathbb{V}(h)] \le F(t) = \frac{a}{1-t} + \frac{b}{t(1-t)},\tag{17}
$$

.

where  $a, b \ge 0$  and  $0 < t \le 1$  since we assumed that  $\lambda \le \frac{2(n-1)}{n}$  $\frac{\frac{n-1}{n}}{n}$ . Note that for  $t \in (0, 1]$ 

$$
\begin{aligned} \frac{\partial F}{\partial t} &= \frac{a}{(1-t)^2} - \frac{(1-2t)b}{t^2(1-t)^2}, \\ \frac{\partial^2 F}{\partial t^2} &= \frac{2a}{(1-t)^3} + \frac{2bt^2(1-t)^2 + 2b(2t-1)^2(1-t)t}{t^4(1-t)^4} \ge 0, \end{aligned}
$$

and, therefore,  $F(t)$  is convex on the interval of interest and achieves its minimum at the positive solution of

$$
at^2 + 2bt - b = 0,
$$

which is

<span id="page-10-0"></span>
$$
t^* = \frac{\sqrt{b^2 + ab} - b}{a} = \frac{\sqrt{b}(\sqrt{a+b} - \sqrt{b})}{(a+b) - b} = \frac{\sqrt{b}}{\sqrt{a+b} + \sqrt{b}} = \frac{1}{\sqrt{a/b} + 1 + 1} \le \frac{1}{2}.
$$
 (18)

Now we are going to cover the relevant interval of  $t-s$  by a geometrically spaced sequence of  $(t_k)_{k \in \mathbb{N}}$ . We have already obtained an upper bound on the relevant interval in [\(18\)](#page-10-0). For the lower bound we substitute the values of  $a$  and  $b$  into [\(18\)](#page-10-0) and obtain

$$
t^* = \left(\sqrt{\frac{2(n-1)\mathbb{E}_{\rho}[\mathbb{V}_n(h)]}{\mathop{\mathrm{KL}}\nolimits(\rho||\pi) + \ln 1/\delta} + 1} + 1\right)^{-1}
$$

Considering the fact that  $KL(\rho||\pi) \ge 0$  and  $\mathbb{V}_n(h) \le \frac{1}{2}$  (which is a simple consequence of Lemma [2](#page-9-1) and our assumption that the loss is bounded in the  $[0, \overline{1}]$  interval) we have

$$
t^* \ge \left(\sqrt{\frac{n-1}{\ln 1/\delta} + 1} + 1\right)^{-1}.
$$

Therefore, the range of  $t$  we are interested in is

$$
t \in \left[ \left( \sqrt{\frac{n-1}{\ln 1/\delta} + 1} + 1 \right)^{-1}, \frac{1}{2} \right].
$$

We cover the above range with the following sequence of t-s:  $t_i = c^i \left( \sqrt{\frac{n-1}{\ln 1/\delta} + 1} + 1 \right)^{-1}$ ,  $i =$  $0, \ldots, m-1$ , where  $c > 1$ . It suffices to take

$$
m = \left\lceil \frac{1}{\ln c} \ln \left( \frac{1}{2} \sqrt{\frac{n-1}{\ln 1/\delta} + 1} + \frac{1}{2} \right) \right\rceil
$$

in order to cover the relevant interval. The value  $t_{m-1}$  is the last value that is strictly less than  $\frac{1}{2}$ . For any particular training set we can find the value  $t_{i^*}, i^* \in \{0, \ldots, m-1\}$ , which satisfies

$$
t_{i^*} \le t^* \le t_{i^*+1} \le ct_{i^*},
$$

where  $t^*$  is the optimal value that minimizes the r.h.s. of [\(17\)](#page-10-1) for a given  $\rho$ . Using this fact we get

$$
F(t_{i^*}) = \frac{a}{1 - t_{i^*}} + \frac{b}{t_{i^*}(1 - t_{i^*})}
$$
  
\n
$$
\leq \frac{a}{1 - t^*} + \frac{b}{(t^*/c)(1 - t^*)}
$$
  
\n
$$
= \frac{a}{1 - \frac{\sqrt{b}}{\sqrt{b} + \sqrt{a+b}}} + \frac{cb}{\left(1 - \frac{\sqrt{b}}{\sqrt{b} + \sqrt{a+b}}\right) \frac{\sqrt{b}}{\sqrt{b} + \sqrt{a+b}}}
$$
  
\n
$$
= \frac{a + cb + c\sqrt{b(a+b)}}{1 - \frac{\sqrt{b}}{\sqrt{b} + \sqrt{a+b}}}
$$
  
\n
$$
= \frac{\left(a + cb + c\sqrt{b(a+b)}\right)\left(\sqrt{a+b} + \sqrt{b}\right)}{\sqrt{a+b}}
$$
  
\n
$$
= a + cb + c\sqrt{b(a+b)} + \frac{a\sqrt{b}}{\sqrt{a+b}} + \frac{cb\sqrt{b}}{\sqrt{a+b}} + cb
$$
  
\n
$$
\leq a + (1 + c)\sqrt{ab} + 4cb,
$$
 (19)

where in the last inequality we used the fact that  $\sqrt{a+b} \leq \sqrt{a}$ . b. Substitution of the values of  $a$  and  $b$  yields [\(6\)](#page-3-2)  $\Box$ 

# B Appendix to Section [5](#page-5-0)

Here we provide proofs of results from section 5 and some technical discussion. First we will need the following result.

<span id="page-11-0"></span>**Lemma 3.** *Consider the random variable*  $\xi = \langle w, v \rangle$  *where*  $w \in \mathbb{R}^d$  *is distributed uniformly over the* d*-dimentional ball of radius centred at the origin and* v ∈ R d *is a fixed vector with nonzero and finite euclidian norm*  $0 < ||v||_2 \leq \infty$ . *Then random variable*  $\xi$  *has the following density function*  $p_{\xi}(x)$  with finite support  $\left[-\epsilon\|\bm{v}\|_{2},\epsilon\|\bm{v}\|_{2}\right]$ :

$$
p_{\xi}(x) = \frac{\left(1 - \frac{x^2}{\epsilon^2 \|\mathbf{v}\|_2^2}\right)^{\frac{d-1}{2}}}{N(\mathbf{v}, \epsilon, d)}
$$

*where*

$$
N(\boldsymbol{v}, \epsilon, d) = 2 \epsilon ||\boldsymbol{v}||_2 \int_0^{\frac{\pi}{2}} \cos^d(t) dt.
$$

*Also*

$$
\mathbb{E}[\xi] = 0, \quad \mathbb{V}[\xi] = \frac{(\epsilon \|\mathbf{v}\|_2)^2}{d+2}.
$$

*Proof.* First of all note that  $\xi \in [-\epsilon \|v\|_2, \epsilon \|v\|_2]$  which is the consequence of Cauchy–Schwarz inequality. Also dew to the symmetry of the support of  $w$  we can restrict ourselves to the situation when  $v$  has only one nonzero coordinate which we'll assume to be the first cordinate.

Let us denote j-th coordinate of a vector  $u \in \mathbb{R}^d$ ,  $j = 1, \ldots, d$ , using the upper index  $u^j$ . Then for any value C from the support of  $p_{\xi}$  condition  $\xi = C$  is equivalent to  $w^1 = C/v^1$  and restricts w to lie in the  $(d-1)$ -dimensional ball of radius  $\sqrt{\epsilon^2 - (C/||v||_2)^2}$  centred at the origin. Then it is obvious that

$$
p_{\xi}(x) \propto \left(1 - \frac{x^2}{\epsilon^2 \|\mathbf{v}\|_2^2}\right)^{\frac{d-1}{2}}.
$$

Now it suffices to find the normalizing constant which we'll denote  $N(\mathbf{v}, \epsilon, d)$ :

$$
N(\boldsymbol{v}, \epsilon, d) = \int_{-\epsilon \|\boldsymbol{v}\|_2}^{\epsilon \|\boldsymbol{v}\|_2} \left(1 - \frac{x^2}{\epsilon^2 \|\boldsymbol{v}\|_2^2}\right)^{\frac{d-1}{2}} dx = 2 \int_0^{\epsilon \|\boldsymbol{v}\|_2} \left(1 - \frac{x^2}{\epsilon^2 \|\boldsymbol{v}\|_2^2}\right)^{\frac{d-1}{2}} dx.
$$

Denoting  $sin(t) = \frac{x}{\epsilon ||v||_2}$  we get

$$
N(\boldsymbol{v}, \epsilon, d) = 2 \epsilon ||\boldsymbol{v}||_2 \int_0^{\frac{\pi}{2}} \cos^d(t) dt,
$$

which completes the proof of the first part of lemma.

Equation  $\mathbb{E}[\xi] = 0$  follows from the fact that  $\xi$  has symmetric distribution. Finally we use the following reduction formula to compute the variance  $\mathbb{V}[\xi]$ . It states that for any  $m, n \in \mathbb{N}$ 

<span id="page-12-0"></span>
$$
\int \sin^m(t) \cos^n(t) dt = -\frac{\sin^{m-1}(t) \cos^{n+1}(t)}{m+n} + \frac{m-1}{m+n} \int \sin^{m-2}(t) \cos^n(t) dt.
$$
 (20)

Since

$$
\mathbb{V}[\xi] = \frac{2 \int_0^{\epsilon \| \bm{v} \|_2} x^2 \left( 1 - \frac{x^2}{\epsilon^2 \| \bm{v} \|_2^2} \right)^{\frac{d-1}{2}} dx}{N(\bm{v}, \epsilon, d)},
$$

again denoting  $sin(t) = \frac{x}{\epsilon ||v||_2}$  we get

$$
\mathbb{V}[\xi] = \frac{2(\epsilon ||\boldsymbol{v}||_2)^3}{N(\boldsymbol{v}, \epsilon, d)} \int_0^{\frac{\pi}{2}} \sin^2(t) \cos^d(t) dt.
$$

Using reduction formula [\(20\)](#page-12-0) we conclude that

$$
\mathbb{V}[\xi] = \frac{2(\epsilon \|\mathbf{v}\|_2)^3}{N(\mathbf{v}, \epsilon, d)} \frac{1}{d+2} \int_0^{\frac{\pi}{2}} \cos^d(t) dt = \frac{(\epsilon \|\mathbf{v}\|_2)^2}{d+2}.
$$

Note that it is easy to recursively compute  $N(\mathbf{v}, \epsilon, d)$  using the following reduction formula:

$$
\int \cos^d(t)dt = \frac{1}{d}\cos^{d-1}(t)\sin(t) + \frac{d-1}{d}\int \cos^{d-2}(t)dt.
$$

Now we are ready to derive all the quantities appearing in the PAC-Bayes bounds for our experimental setting. We will begin with the following result, which holds only for the particular choice of the radius  $\epsilon$  of the posterior distribution.

<span id="page-12-4"></span>**Theorem 6.** Let the posterior and prior distributions  $\rho_{\hat{\boldsymbol{w}}}$  and  $\pi$  be defined as in Section [5,](#page-5-0) take the *radius of posterior distribution to be*  $\hat{\epsilon} = \min_{i=1,...,n} |Y_i - \langle \hat{w}, X_i \rangle|$ , and assume that  $\hat{\epsilon} > 0$ . Then *we have*

$$
KL(\rho_{\hat{\mathbf{w}}} \| \pi) = d \ln \frac{2}{\hat{\epsilon}};
$$
\n(21)

$$
\mathbb{E}_{h \sim \rho_{\hat{\boldsymbol{\omega}}}}[L_n(h)] = L_n(h_{\hat{\boldsymbol{\omega}}});\tag{22}
$$

$$
\mathbb{E}_{h\sim\rho_{\hat{\mathbf{w}}}}[\mathbb{V}_n(h)] = \frac{1}{n-1} \sum_{i=1}^n \left( (Y_i - \langle \hat{\mathbf{w}}, X_i \rangle)^2 + \frac{\hat{\epsilon}^2}{d+2} \|X_i\|_2^2 \right) - \frac{n}{n-1} \left( L_n(h_{\hat{\mathbf{w}}}) \right)^2 - \frac{\hat{\epsilon}^2}{4n(n-1)(d+2)} \sum_{i=1}^n \sum_{j=1}^n \langle X_i, X_j \rangle \text{sgn}\left\{ (Y_i - \langle \hat{\mathbf{w}}, X_i \rangle)(Y_j - \langle \hat{\mathbf{w}}, X_j \rangle) \right\}.
$$
 (23)

*Proof.* Let us start from the derivation of [\(21\)](#page-12-1):

$$
\text{KL}(\rho \|\pi) = \int_{\|\mathbf{w}\| \leq \frac{1}{2}} \rho_{\hat{\mathbf{w}}}(\mathbf{w}) \ln \frac{\rho_{\hat{\mathbf{w}}}(\mathbf{w})}{\pi(\mathbf{w})} d\mathbf{w} =
$$
  
= 
$$
\int_{\|\mathbf{w}\| \leq \frac{1}{2}} 1_{\{\|\mathbf{w} - \hat{\mathbf{w}}\|_2 \leq \hat{\epsilon}\}} \frac{1}{V(\hat{\epsilon}, d)} \ln \frac{V(1/2, d)}{V(\hat{\epsilon}, d)} d\mathbf{w} = d \ln \frac{2}{\hat{\epsilon}},
$$

where  $V(\epsilon, d)$  is the volume of d-dimensional ball with radius  $\epsilon$ .

<span id="page-12-3"></span><span id="page-12-2"></span><span id="page-12-1"></span> $\Box$ 

Now recall the definition

$$
\hat{\epsilon} = \min_{i=1,\dots,n} (|Y_i - \langle \hat{\boldsymbol{w}}, X_i \rangle|).
$$

It implies that for any  $i = 1, \ldots, n$  random variables  $\xi_i = Y_i - \langle w, X_i \rangle$  (where  $w \sim \rho_{\hat{w}}$ ) do not change their signs. Then equation [\(22\)](#page-12-2) follows immediately from the definition:

$$
\mathbb{E}_{h\sim\rho_{\hat{\boldsymbol{\omega}}}}[L_n(h)] = \frac{1}{n}\sum_{i=1}^n \mathbb{E}_{\boldsymbol{w}\sim\rho_{\hat{\boldsymbol{\omega}}}}[|Y_i - \langle \boldsymbol{w}, X_i \rangle|] = \frac{1}{n}\sum_{i=1}^n |Y_i - \langle \hat{\boldsymbol{w}}, X_i \rangle|] = L_n(\hat{h}).
$$

Finally let us derive [\(23\)](#page-12-3). Using Lemma [2](#page-9-1) we write

<span id="page-13-0"></span>
$$
\mathbb{E}_{h \sim \rho_{\hat{\mathbf{w}}}}[\mathbb{V}_n(h)] = \frac{1}{n-1} \sum_{i=1}^n \mathbb{E}_{\mathbf{w} \sim \rho_{\hat{\mathbf{w}}}}[(Y_i - \langle \mathbf{w}, X_i \rangle)^2] - \frac{1}{n(n-1)} \mathbb{E}_{\mathbf{w} \sim \rho_{\hat{\mathbf{w}}}}\left[\left(\sum_{i=1}^n |Y_i - \langle \mathbf{w}, X_i \rangle|\right)^2\right].
$$
\n(24)

Now note that

$$
\mathbb{E}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ (Y_i - \langle \mathbf{w}, X_i \rangle)^2 \right] = \mathbb{E}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ (Y_i - \langle \hat{\mathbf{w}}, X_i \rangle + \langle \hat{\mathbf{w}} - \mathbf{w}, X_i \rangle)^2 \right] = = (Y_i - \langle \hat{\mathbf{w}}, X_i \rangle)^2 + 2\mathbb{E}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ (Y_i - \langle \hat{\mathbf{w}}, X_i \rangle) (\langle \hat{\mathbf{w}} - \mathbf{w}, X_i \rangle) \right] + \mathbb{E}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ (\langle \hat{\mathbf{w}} - \mathbf{w}, X_i \rangle)^2 \right].
$$

The second summand in the last expression is equal to zero since  $\mathbb{E}_{w \sim \rho_{\hat{w}}}[w] = \hat{w}$ . By the same reason we conclude that

$$
\mathbb{E}_{\boldsymbol{w}\sim\rho_{\hat{\boldsymbol{w}}}}\big[(\langle \hat{\boldsymbol{w}}-\boldsymbol{w},X_i\rangle)^2\big]=\mathbb{V}_{\boldsymbol{w}\sim\rho_{\hat{\boldsymbol{w}}}}[\langle \hat{\boldsymbol{w}}-\boldsymbol{w},X_i\rangle].
$$

Now note that vector  $(\hat{\boldsymbol{w}} - \boldsymbol{w}) \in \mathbb{R}^d$  is uniformly distributed in the d-dimensional ball with radius  $\hat{\epsilon}$  centred at the origin and also that  $||X_i||_2 \leq 1$ . We can apply Lemma [3](#page-11-0) to get

$$
\mathbb{E}_{\mathbf{w}\sim\rho_{\hat{w}}}[(\langle \hat{\mathbf{w}}-\mathbf{w}, X_i \rangle)^2] = \frac{(\hat{\epsilon}||X_i||_2)^2}{d+2},
$$

meaning that

$$
\mathbb{E}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ (Y_i - \langle \mathbf{w}, X_i \rangle)^2 \right] = (Y_i - \langle \hat{\mathbf{w}}, X_i \rangle)^2 + \frac{(\hat{\epsilon}||X_i||_2)^2}{d+2}.
$$
 (25)

Finally

$$
\mathbb{E}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ \left( \sum_{i=1}^{n} |Y_i - \langle \mathbf{w}, X_i \rangle| \right)^2 \right] = \mathbb{V}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ \sum_{i=1}^{n} |Y_i - \langle \mathbf{w}, X_i \rangle| \right] + \left( \sum_{i=1}^{n} \mathbb{E}_{\mathbf{w}\sim\rho_{\hat{w}}} [|Y_i - \langle \mathbf{w}, X_i \rangle|] \right)^2 =
$$

$$
= \mathbb{V}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ \sum_{i=1}^{n} |Y_i - \langle \mathbf{w}, X_i \rangle| \right] + \left( n L_n(\hat{h}) \right)^2, \tag{26}
$$

where we used [\(22\)](#page-12-2). For any sequence of random variables  $\xi_1, \ldots, \xi_n$  we have

<span id="page-13-1"></span>
$$
\mathbb{V}\left[\sum_{i=1}^n \xi_i\right] = \sum_{i=1}^n \sum_{j=1}^n \mathbb{E}\left[(\xi_i - \mathbb{E}[\xi_i])(\xi_j - \mathbb{E}[\xi_j])\right].
$$

Using

$$
\xi_i=|Y_i-\langle \boldsymbol{w}, X_i\rangle|=|Y_i-\langle \hat{\boldsymbol{w}}, X_i\rangle+\langle \hat{\boldsymbol{w}}-\boldsymbol{w}, X_i\rangle|,
$$

we can rewrite

$$
\mathbb{V}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ \sum_{i=1}^{n} |Y_i - \langle \mathbf{w}, X_i \rangle| \right] =
$$
\n
$$
= \sum_{i=1}^{n} \sum_{j=1}^{n} \mathbb{E}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ \left( \xi_i - |Y_i - \langle \hat{\mathbf{w}}, X_i \rangle| \right) \left( \xi_j - |Y_j - \langle \hat{\mathbf{w}}, X_j \rangle| \right) \right],
$$
\n(27)

where we again used the fact that random variables  $Y_i - \langle w, X_i \rangle$ ,  $i = 1, \dots, n$ , does not change the sign. Since for any  $a, b \in \mathbb{R}$  such that  $|b| \ge |a|$  we have  $|b + a| - |b| = \text{sgn}\{b\} \cdot a$  we can write

<span id="page-13-2"></span>
$$
\xi_i - |Y_i - \langle \hat{\boldsymbol{w}}, X_i \rangle| = \text{sgn}\big\{Y_i - \langle \hat{\boldsymbol{w}}, X_i \rangle\big\} \langle \hat{\boldsymbol{w}} - \boldsymbol{w}, X_i \rangle.
$$

Then we have

$$
\mathbb{E}_{\mathbf{w}\sim\rho_{\hat{\mathbf{w}}}}\Big[\big(\xi_i-|Y_i-\langle \hat{\mathbf{w}},X_i\rangle|\big)\big(\xi_j-|Y_j-\langle \hat{\mathbf{w}},X_j\rangle|\big)\Big]=\n\exp\big\{\big(Y_i-\langle \hat{\mathbf{w}},X_i\rangle|\big(Y_j-\langle \hat{\mathbf{w}},X_j\rangle)\big\}\mathbb{E}_{\mathbf{w}\sim\rho_{\hat{\mathbf{w}}}}\Big[\langle \hat{\mathbf{w}}-\mathbf{w},X_i\rangle\langle \hat{\mathbf{w}}-\mathbf{w},X_j\rangle\Big].
$$
\n(28)

Now use the fact that

 $=$ 

$$
\mathbb{E}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ \langle \hat{\mathbf{w}} - \mathbf{w}, X_i \rangle \langle \hat{\mathbf{w}} - \mathbf{w}, X_j \rangle \right] =
$$
\n
$$
= \frac{1}{4} \mathbb{E}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ \left( \langle \hat{\mathbf{w}} - \mathbf{w}, X_i + X_j \rangle \right)^2 - \left( \langle \hat{\mathbf{w}} - \mathbf{w}, X_i - X_j \rangle \right)^2 \right] =
$$
\n
$$
= \frac{1}{4} \mathbb{V}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ \langle \hat{\mathbf{w}} - \mathbf{w}, X_i + X_j \rangle \right] - \frac{1}{4} \mathbb{V}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ \langle \hat{\mathbf{w}} - \mathbf{w}, X_i - X_j \rangle \right].
$$

Again noting that vector  $(\hat{\boldsymbol{w}} - \boldsymbol{w}) \in \mathbb{R}^d$  is uniformly distributed in the d-dimensional ball with radius  $\hat{\epsilon}$  centred at the origin and that  $||X_i - X_j||_2 \leq 1$ ,  $||X_i + X_j||_2 \leq 1$ , we can apply Lemma [3](#page-11-0) and get

$$
\mathbb{E}_{\mathbf{w}\sim\rho_{\hat{w}}} \left[ \langle \hat{\mathbf{w}} - \mathbf{w}, X_i \rangle \langle \hat{\mathbf{w}} - \mathbf{w}, X_j \rangle \right] =
$$
\n
$$
= \frac{(\hat{\epsilon}||X_i + X_j||_2)^2}{4(d+2)} - \frac{(\hat{\epsilon}||X_i - X_j||_2)^2}{4(d+2)} = \frac{\hat{\epsilon}^2 \langle X_i, X_j \rangle}{4(d+2)}.
$$
\n(29)

Combining [\(24\)](#page-13-0)–[\(29\)](#page-14-0) altogether we complete the proof.

Note that the choice  $\hat{\epsilon} = \min_{i=1,...,n} |Y_i - \langle \hat{w}, X_i \rangle|$  can lead to very large values of  $KL(\rho_{\hat{w}}, \pi)$ because of the equation [\(21\)](#page-12-1). We can overcome this problem using the following theorem which lets us pick arbitrary value of  $\epsilon$ .

**Theorem 7.** Let  $n_{\epsilon}$  be the number of points such that  $|Y_i - \langle \hat{\boldsymbol{w}}, X_i \rangle| < \epsilon$ . Then for posterior and *prior distributions*  $\rho_{\hat{\mathbf{w}}}$  *and*  $\pi$  *defined as in Section* [5](#page-5-0) *we have* 

$$
\text{KL}(\rho_{\hat{\mathbf{w}}}\|\pi) = d \ln \frac{2}{\epsilon};
$$
\n
$$
\mathbb{E}_{h \sim \rho_{\hat{\mathbf{w}}}}[L_n(h)] \le L_n(h_{\hat{\mathbf{w}}}) + \epsilon \frac{n_{\epsilon}}{n};
$$
\n
$$
\mathbb{E}_{h \sim \rho_{\hat{\mathbf{w}}}}[\mathbb{V}_n(h)] \le \frac{1}{n-1} \sum_{i=1}^n \left( (Y_i - \langle \hat{\mathbf{w}}, X_i \rangle)^2 + \frac{\epsilon^2}{d+2} \|X_i\|_2^2 \right) - \frac{1}{n(n-1)} \left( \sum_{i=1}^n \mathbb{1}\{|Y_i - \langle \hat{\mathbf{w}}, X_i \rangle| \ge \epsilon\} \left[ |Y_i - \langle \hat{\mathbf{w}}, X_i \rangle| \right] \right)^2 - \frac{1}{n(n-1)} \sum_{i=1}^n \sum_{j=1}^n \gamma_{i,j};
$$
\n
$$
\gamma_{i,j} = \begin{cases}\n\text{sgn}\{(Y_i - \langle \hat{\mathbf{w}}, X_i \rangle)(Y_j - \langle \hat{\mathbf{w}}, X_j \rangle)\} \frac{\epsilon^2 \langle X_i, X_j \rangle}{4(d+2)}, & \text{if } A_i \cap A_j; \\
-\frac{\epsilon^2 \|X_i\|_2}{\sqrt{d+2}}, & \text{if } A_i \cap A_j; \\
-\frac{\epsilon^2 \|X_j\|_2}{\sqrt{d+2}}, & \text{if } A_i^c \cap A_j; \\
-\epsilon^2, & \text{if } A_i^c \cap A_j; \\
-\epsilon^2, & \text{if } A_i^c \cap A_j^c.\n\end{cases}
$$

where we have defined events  $A_i = \{ |Y_i - \langle \hat{w}, X_i \rangle | \geq \epsilon \}$  and  $A^c$  is the complement of event A.

*Proof.* The proof repeats the one of Theorem [6](#page-12-4) with minor changes. The main difference is that now for indices i such that  $|Y_i - \langle \hat{\bm{w}}, X_i \rangle| < \epsilon$  random variables  $\xi_i = Y_i - \langle \bm{w}, X_i \rangle$  change their signs as w varies. Thus for these  $\xi_i$  the mean value  $\mathbb{E}[\xi_i]$  is no longer  $|Y_i - \langle \hat{\boldsymbol{\omega}}, X_i \rangle|$  and has more complicated form. Instead of computing  $\mathbb{E}_{h\sim\rho_{\hat{w}}}[L_n(h)]$  precisely we will upper bound  $\mathbb{E}[\xi_i]$  for such a  $i$  using

$$
\mathbb{E}_{\boldsymbol{w}\sim\rho_{\hat{\boldsymbol{w}}}}[|Y_i - \langle \boldsymbol{w}, X_i \rangle]] = \mathbb{E}_{\boldsymbol{w}\sim\rho_{\hat{\boldsymbol{w}}}}[|Y_i - \langle \hat{\boldsymbol{w}}, X_i \rangle + \langle \hat{\boldsymbol{w}} - \boldsymbol{w}, X_i \rangle]] \leq \\ \leq |Y_i - \langle \hat{\boldsymbol{w}}, X_i \rangle| + \epsilon ||X_i||_2 \leq |Y_i - \langle \hat{\boldsymbol{w}}, X_i \rangle| + \epsilon
$$

which completes the proof for the  $\mathbb{E}_{h \sim \rho_{\hat{\mathbf{w}}}}[L_n(h)]$ .

<span id="page-14-0"></span> $\Box$ 

We will also derive an upper bound for  $\mathbb{E}_{h\sim\rho_{\hat{\omega}}}[\mathbb{V}_n(h)]$ . To do so we need the lower bound for the second term in right hand side of [\(24\)](#page-13-0) (first term stays unchanged compared to Theorem [6\)](#page-12-4). First we will use the following lower bound for the term appearing in  $(26)$ :

$$
\left(\sum_{i=1}^n \mathbb{E}_{\mathbf{w}\sim\rho_{\hat{\mathbf{w}}}}[|Y_i - \langle \mathbf{w}, X_i \rangle|]\right)^2 \geq \left(\sum_{i=1}^n \mathbb{1}\{|Y_i - \langle \hat{\mathbf{w}}, X_i \rangle| \geq \epsilon\}|[Y_i - \langle \hat{\mathbf{w}}, X_i \rangle|]\right)^2.
$$

Finally we need the lower bound for the variance

$$
\mathbb{V}_{\mathbf{w}\sim\rho_{\hat{w}}}\left[\sum_{i=1}^n|Y_i-\langle\mathbf{w},X_i\rangle|\right]
$$

which we derive through the lower bounds for the covariance terms appearing in [\(27\)](#page-13-2) corresponding to the pairs  $(i, j)$  such that either  $|Y_i - \langle \hat{\boldsymbol{w}}, X_i \rangle| < \epsilon$  or  $|Y_j - \langle \hat{\boldsymbol{w}}, X_j \rangle| < \epsilon$  (for all the other terms we have already derived the precise forms in previous proof). It is known that for random variables  $\xi$ ,  $\eta$  of finite variances the following holds:

$$
\left|\mathbb{E}\big[(\xi-\mathbb{E}[\xi])(\eta-\mathbb{E}[\eta])\big]\right|\leq \sqrt{\mathbb{V}[\xi]\mathbb{V}[\eta]},
$$

meaning

$$
\mathbb{E}\big[(\xi - \mathbb{E}[\xi])(\eta - \mathbb{E}[\eta])\big] \geq -\sqrt{\mathbb{V}[\xi]\mathbb{V}[\eta]}.
$$

Note that if  $|Y_i - \langle \hat{\boldsymbol{w}}, X_i \rangle| < \epsilon$  then  $|Y_i - \langle \boldsymbol{w}, X_i \rangle| \leq 2\epsilon$  and we have

$$
\mathbb{V}_{\mathbf{w}\sim\rho_{\hat{\mathbf{w}}}}[|Y_i - \langle \mathbf{w}, X_i \rangle|] \leq \epsilon^2,
$$

where we used the fact that for random variable  $\xi \in [0, 1]$  we have  $\mathbb{V}[\xi] \leq 1/4$ .

If  $|Y_i - \langle \hat{\boldsymbol{w}}, X_i \rangle| \geq \epsilon$  we have

$$
\mathbb{V}_{\bm{w}\sim\rho_{\bm{\hat{w}}}}[|Y_i - \langle \bm{w},X_i \rangle|] = \mathbb{V}_{\bm{w}\sim\rho_{\bm{\hat{w}}}}[\langle \hat{\bm{w}} - \bm{w},X_i \rangle] = \frac{(\epsilon \|X_i\|_2)^2}{d+2}
$$

which completes the proof.

**Comments on section [5](#page-5-0).** Note that for posterior distribution  $\rho_{\hat{w}}$  defined as in Section 5 we clearly have  $B(x, \rho_{\hat{w}}) = \mathbb{E}_{\mathbf{w} \sim \rho_{\hat{w}}}[h_{\mathbf{w}}(x)] = \dot{h}_{\hat{w}}(x)$  meaning that the weighted (Bayes) regression rule coincides with the deterministic hypothesis  $h_{\hat{w}}$ . Also note that the convexity of absolute deviation loss implies that

$$
\mathbb{E}_{(X,Y)\sim\mathcal{D}}[|B(X,\rho)-Y|] \leq \mathbb{E}_{(X,Y)\sim\mathcal{D}}\mathbb{E}_{\mathbf{w}\sim\rho}[|h_{\mathbf{w}}(X)-Y|] = L(G_{\rho})
$$

for any distribution  $\rho$ . Together these two facts yield that any upper bound on the true loss of Gibbs regression rule associated with posterior distribution  $\rho_{\hat{w}}$  also upper bounds the true loss of deterministic hypothesis  $h_{\hat{w}}$ . The same is true if we use quadratic or any other convex loss function instead of the absolute loss.

### C PAC-Bayesian Lemma

*Proof of Lemma [1.](#page-4-4)* We start with Donsker-Varadhan's variational definition of relative entropy [\[17\]](#page-8-16), which states that  $KL(\rho || \pi) = \sup_f (\mathbb{E}_{\rho}[f(h)] + \ln \mathbb{E}_{\pi}[e^{f(h)}]),$  where the supremum is taken over all measurable functions  $f : \mathcal{H} \to \mathbb{R}$ . Obviously, we can extend the range of f and take  $f = f_n$ :  $H \times (\mathcal{X} \times \mathcal{Y})^n \to \mathbb{R}$ . Changing sides in the definition we have that

<span id="page-15-0"></span>
$$
\mathbb{E}_{\rho}\left[f_n(h,S)\right] \leq \mathrm{KL}(\rho \| \pi) + \ln \mathbb{E}_{\pi}\left[e^{f_n(h,S)}\right]
$$
\n(30)

for all pairs ( $\rho$ ,  $\pi$ ) simultaneously and any S. Note that there is nothing probabilistic in the above argument.

Now we fix  $\pi$  (so that  $\pi$  does not depend on S). Then with probability greater than  $1 - \delta$  (over the randomness of the data) we have:

$$
\mathbb{E}_{\pi}\left[e^{f_n(h,S)}\right] \leq \frac{1}{\delta} \mathbb{E}_{S' \sim \mathcal{D}^n} \left[\mathbb{E}_{h \sim \pi}\left[e^{f_n(h,S')}\right]\right] = \frac{1}{\delta} \mathbb{E}_{h \sim \pi}\left[\mathbb{E}_{S' \sim \mathcal{D}^n}\left[e^{f_n(h,S')}\right]\right],
$$

 $\Box$ 

where the first step follows by Markov's inequality (we consider  $\mathbb{E}_{\pi} \left[ e^{f_n(h,S)} \right]$  as a random variable and apply Markov's inequality to this random variable) and in the second step we can exchange the order of expectations because  $\pi$  is independent of S. Substituting this result back into [\(30\)](#page-15-0) we obtain that with probability greater than  $1 - \delta$  simultaneously for all  $\rho$ :

$$
\mathbb{E}_{\rho}[f_n(h, S)] \leq \text{KL}(\rho || \pi) + \ln \frac{1}{\delta} + \ln \mathbb{E}_{\pi} \left[ \mathbb{E}_{S' \sim \mathcal{D}^n} \left[ e^{f_n(h, S')} \right] \right].
$$