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# On Margins and Derandomisation in PAC-Bayes

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#### Abstract

We develop a framework for derandomising PAC-Bayesian generalisation bounds achieving a margin on training data, relating this process to the concentration-of-measure phenomenon. We apply these tools to linear prediction, single-hidden-layer neural networks with an unusual erf activation function, and deep ReLU networks, obtaining new bounds. The approach is also extended to the idea of "partial-derandomisation" where only some layers are derandomised and the others are stochastic. This allows empirical evaluation of single-hidden-layer networks on more complex datasets, and helps bridge the gap between generalisation bounds for non-stochastic deep networks and those for randomised deep networks as generally examined in PAC-Bayes.

# 1 Introduction

PAC-Bayesian<sup>1</sup> generalisation bounds have recently seen a resurgence of interest after the comparative successes of a series of papers applying them to deep neural networks, beginning with Dziugaite and Roy (2017, 2018); Neyshabur et al. (2018), and Zhou et al. (2019); see Pérez and Louis (2020) for a broad review of such results. Understanding generalisation in this setting is one of the central contemporary challenges of statistical learning theory as the gap between excellent observed empirical performance and "classical" predictions of overfitting (leading to failing generalisation) is poorly understood.

However, PAC-Bayesian results typically bound the loss of randomised predictors with high probability over the data (usually in expectation, although it is sometimes possible to provide high-probability bounds over sampled estimators themselves, as in for example Viallard et al., 2021). Most PAC-Bayesian guarantees for neural networks have therefore used stochastic neural networks (also widespread in the Bayesian deep learning literature – see *e.g.* Blundell et al., 2015).

Typically we are more interested in bounds on non-randomised predictors, and here we return to the strategy of derandomising predictors based on margin (Novikoff, 1962) assumptions, as first explored in PAC-Bayes by Langford and Shawe-Taylor (2003), and applied to neural networks by Neyshabur et al. (2018). We formalise the strategy and use it to obtain new derandomised PAC-Bayesian bounds for linear predictors and one-hidden-layer

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<sup>&</sup>lt;sup>1</sup>PAC-Bayes theory originates in the seminal papers from Shawe-Taylor and Williamson, 1997, McAllester, 1998 and McAllester (1999), and was further formalised by Catoni, 2007, among others – we refer to Guedj, 2019 for a recent overview.

neural networks with erf activations. We also introduce the idea of partial-derandomisation, allowing us to apply the above to deeper networks with *some* weights randomised, allowing evaluation of the above in more complex empirical situations.

Through this work we hope in particular to highlight a strong link between successful derandomisation and the concentration-of-measure phenomenon (which is a cornerstone of PAC-Bayes). If the parameters of our predictor are robust to perturbations (as neural networks often are), a less concentrated "predictive" distribution on them is needed. Derandomisation then follows easily while such a predictive distribution leads to tighter PAC-Bayesian bounds in a kind of "Occam's razor". As the powerful mathematical tools in this area develop we hope this idea will open new routes to theoretical analysis.

**Contributions and structure.** This paper gives a framework for deranomising PAC-Bayesian bounds and a number of applications to different settings. In Section 2 we discuss and formalise the derandomisation of PAC-Bayesian bounds using margins and averaging. In Section 3 we use this to obtain margin bounds for  $L_2$  and  $L_1$  regularised linear prediction (classes which include SVMs and boosting respectively); in the  $L_2$  "hard-margin" case this improves on the bound of Bartlett and Shawe-Taylor (1998) and matches the lower bound of Grønlund et al. (2020).

In Section 4 we extend this analysis to the aforementioned partially-derandomised predictors, and then in Section 5 to one-hidden-layer neural networks with erf activations (which are very similar in form to the sigmoidal tanh sometimes used). This final step is inspired by the work of Germain et al. (2009) and Letarte et al. (2019), which consider averaging over the predictions of functions like  $f_w : \mathbb{R}^d \to \mathbb{R}, x \mapsto \operatorname{sign}(w \cdot x)$ , where  $w \sim \mathcal{N}(u, I)$ , giving "aggregated" prediction functions of the form

$$F(x) = \mathbb{E}_{w \sim \mathcal{N}(u,I)} \operatorname{sign}(w \cdot x) = \operatorname{erf}(u \cdot x/\sqrt{2} \|x\|_2).$$
(1)

The above also enables us to provide PAC-Bayesian bounds for partially-derandomised neural networks with the final two layers derandomised, but the initial layers having randomised weights. This provides a middle ground between a series of works obtaining bounds for stochastic neural networks such as Dziugaite and Roy (2017), and those providing margin bounds for non-stochastic DNNs, such as (in a PAC-Bayesian context) Neyshabur et al. (2018). This enables us to examine our one-hidden-layer bounds "stacked" on a randomised network and thus evaluate them on more complex datasets without severe underfitting.

Finally, in Section 6, we provide a derandomised PAC-Bayes margin bound for deep ReLU networks, similar in form to and with proof ideas drawing from that given by Neyshabur et al. (2018). We hope that the unifying perspective and simplified proof will help foster a deeper understanding of the existing result and how it may be improved.

**Societal impact.** Due to the theoretical nature of this work, we do not foresee specific potential for negative societal impact. While we strongly hope our results and methods can be used for the greater good, this is ultimately left to the practitioners who will find application of them.

**Notation.** We will consider classification of i.i.d. examples from a distribution,  $\mathcal{D}$ , on some product space  $\mathcal{Z} = \mathcal{X} \times \mathcal{Y}$ , by vector-valued hypotheses in a function space  $\mathcal{H} \subset \hat{\mathcal{Y}}^{\mathcal{X}}$ . For binary classification  $\mathcal{Y} = \{+1, -1\}, \ \hat{\mathcal{Y}} = \mathbb{R}$  and we take the sign of the output as our prediction, while for multi-class prediction,  $\mathcal{Y} = [c] := \{1, \ldots, c\}, \ \hat{\mathcal{Y}} = \mathbb{R}^c$  and the maximum argument is the prediction.

The multi-class margin,  $M : \mathcal{H} \times \mathcal{Z} \to \mathbb{R}$  is the mapping

$$M(f,(x,y)) := f(\boldsymbol{x})[y] - \max_{y' \neq y} f(\boldsymbol{x})[y']$$

where by f(x)[y] we indicate the *y*th component of f(x). In a slight abuse of notation we also define the binary margin M(f, (x, y)) := yf(x). We note that both are positive homogeneous so that  $M(\theta f, z) = \theta M(f, z)$  for all  $f, z, \theta > 0$ .

We define the margin error  $L_{\gamma}(f) := \mathbb{P}_{z \sim \mathcal{D}}\{M(f, z) \leq \gamma\}$ , also writing  $L(f) := L_0(f)$  for the misclassification loss or probability of error, and  $\hat{L}_{\gamma}(h) := m^{-1}|\{(x, y) \in S : yh(x) < \gamma\}|$ for the empirical margin error (defined for some sample  $S \sim \mathcal{D}^m$  and margin  $\gamma \geq 0$ ).

As is common in the PAC-Bayes literature, when considering distributions over hypotheses  $P \in \mathcal{M}_1(\mathcal{H})$  (by which we denote the space of probability measures on  $\mathcal{H}$ ), we write  $L(P) := \mathbb{E}_{f \sim P} L(f)$  interchangeably with the above, and analogously with other margin errors<sup>2</sup>.

# 2 PAC-Bayes for approximations

In this section we discuss a method for substituting or "approximating" one distribution over prediction functions for another through a coupling method, and from this derive PAC-Bayesian margin bounds, including for derandomised estimators.

#### 2.1 Approximation of predictive distributions

Let  $P, Q \in \mathcal{M}_1(\mathcal{H})$  be distributions on prediction functions in  $\mathcal{H}$ , as generally considered in PAC-Bayes. We denote by  $\Pi(P,Q) \subset \mathcal{M}_1(\mathcal{H} \times \mathcal{H})$  the set of product distributions with marginals P and Q (also known as couplings between P and Q). For each of these distributions, the margins of these functions are sets of real variables indexed by  $\mathcal{Z}$  (and can equivalently be viewed as real-valued stochastic processes on  $\mathcal{Z}$ ).

We define the upper  $\gamma$ -approximate variation of these margins (defined as a relaxation of the total variation distance) as

$$\mathrm{UAV}_{\gamma}(P,Q) := \inf_{\pi \in \Pi(P,Q)} \sup_{z \in \mathcal{Z}} \mathbb{P}_{(f,g) \sim \pi} \left\{ M(f,z) - M(g,z) > \gamma/2 \right\}.$$

In the case of the binary margin, M(f, (x, y)) = yf(x) with  $y \in \{+1, -1\}$ , so the above is symmetric under interchange of P and Q; this is not true in general. We therefore define the symmetrised version, the  $\gamma$ -approximate variation on  $\mathcal{Z}$ , as

$$AV_{\gamma}(P,Q) := \max(UAV_{\gamma}(P,Q), UAV_{\gamma}(Q,P)).$$

We say P and  $Q(\gamma, \epsilon)$ -approximate each other on  $\mathcal{Z}$  if  $AV_{\gamma}(P, Q) \leq \epsilon$ . This immediately implies the possibility of substituting one margin loss for another at the cost of these terms and a margin.

**Lemma 1.** Let  $\gamma > 0, \epsilon \ge 0$ ; if  $P, Q \in \mathcal{M}_1(\mathcal{H})$  with  $AV_{\gamma}(P,Q) \le \epsilon$ , then for any data distribution  $\mathcal{D}$ ,  $L(P) \le L_{\gamma/2}(Q) + \epsilon$  and  $L_{\gamma/2}(Q) \le L_{\gamma}(P) + \epsilon$ .

*Proof.* For any events  $A, B, \mathbb{P}(A) \leq \mathbb{P}(B) + \mathbb{P}(\bar{B} \cap A)$ ; and for any coupling  $\pi \in \Pi(P, Q)$  we have

$$\begin{split} L(P) &= E_{g \sim P} \mathbb{P}_{z \sim \mathcal{D}} \left\{ M(g, z) \leq 0 \right\} \\ &\leq \mathbb{E}_{f \sim Q} \mathbb{P}_{(\boldsymbol{x}, y) \sim \mathcal{D}} \left\{ M(f, z) \leq \gamma/2 \right\} + \mathbb{E}_{(f, g) \sim \pi} \mathbb{P}_{(\boldsymbol{x}, y) \sim \mathcal{D}} \left\{ M(f, z) > \gamma/2 \land M(g, z) \leq 0 \right\} \\ &\leq \mu[L_{\gamma/2}] + \mathbb{E}_{(\boldsymbol{x}, y) \sim \mathcal{D}} \mathbb{P}_{(f, g) \sim \pi} \left\{ M(f, z) - M(g, z) > \gamma/2 \right\}. \end{split}$$

Replacing the expectation with its pointwise bound and taking the infimum over couplings, we find that  $L(P) \leq L_{\gamma/2}(Q) + \text{UAV}_{\gamma}(P,Q)$ . An analogous process follows for the other side, with the order of Q and P reversed.

<sup>&</sup>lt;sup>2</sup>When considering functions in  $\mathcal{H}$  parameterised by some space  $\Theta$  (of which  $\mathcal{H}$  may be a quotient), we will be somewhat loose with interchanging  $\mathcal{M}_1(\mathcal{H})$  with  $\mathcal{M}_1(\Theta)$ ; this will not affect any results in practice, as the KL divergence between distributions on the  $\Theta$  upper bounds that of their image distributions on  $\mathcal{H}$ .

**Remark.** A less sophisticated analysis could have used the bound  $|M(f, z) - M(g, z)| \le 2 \max_{y \in \mathcal{Y}} |f(x)[y] - g(x)[y]|$  instead, leading to similar PAC-Bayes bounds. This definition of AV improves constants in some derived bounds and removes a factor of c, the number of classes. We also note that the coupling need not be the same on both sides of the bounds, although we do not use this in later proofs.

#### 2.2 PAC-Bayes bounds with approximations

Lemma 1 can be used to derive a type of PAC-Bayesian bound for a predictive distribution Q, as follows. First we define the  $(\gamma, \epsilon)$ -approximating KL projection onto a prior  $P_0 \in \mathcal{M}_1(\mathcal{H})$  (defined independently of the data), of  $(\gamma, \epsilon)$ -approximations to Q.

**Definition 1.** Approximating KL-Projection: Given some prior distribution  $P_0$  on  $\mathcal{H}$ , the  $(\gamma, \epsilon)$ -approximate projection of Q onto  $P_0$  is

$$\kappa(Q, P_0; \gamma, \epsilon) := \min_{P \in \mathcal{P}} \operatorname{KL}(P, P_0)$$

where  $\mathcal{P} = \{ P \in \mathcal{M}^1(\mathcal{H}), AV_{\gamma}(P,Q) \leq \epsilon \}.$ 

This can be viewed as the "closest" (in the KL sense) proxy, P, to our prior that approximates Q sufficiently well. In practice, we will restrict the family of proxies,  $\mathcal{P}$ , to some more tractable set and construct P explicitly. The notion can be used in combination with many PAC-Bayesian bounds, replacing the usual KL divergence with a new complexity term and the losses with margin losses. We give the following formulations as examples.

**Theorem 1.** Given data distribution  $\mathcal{D}$  on  $\mathcal{X} \times \mathcal{Y}$ , prior  $P_0 \in \mathcal{M}^1(\mathcal{H})$ ,  $\gamma > 0, \epsilon \in [0, \frac{1}{2}], m \ge 8$ and  $\delta \in (0, 1)$ , the following hold each with probability  $\ge 1 - \delta$  over  $S \sim D^m$ , for all  $Q \in \mathcal{M}^1(\mathcal{H})$ 

"small-kl"

$$\operatorname{kl}(\hat{L}_{\gamma}(Q) + \epsilon : L(Q) - \epsilon) \leq \frac{1}{m} \left( \kappa(Q, P_0; \gamma, \epsilon) + \log \frac{2\sqrt{m}}{\delta} \right)$$

"interpolating" (given that  $\hat{L}_{\gamma}(Q) = 0$ )

$$L(Q) \le \frac{\kappa(Q, P_0; \gamma, \epsilon) + \log \frac{1}{\delta}}{m} + 4\epsilon \log \frac{1}{\epsilon},$$

where  $kl(q:p) = q \log \frac{p}{q} + (1-q) \log \frac{1-p}{1-q}$  if  $p \ge q$  and otherwise 0 (this formulation is monotonic in q and thus one-sided).

*Proof.* The standard PAC-Bayesian bounds (see Appendix A) with loss function  $\ell_{\gamma/2}$  are true for the minimising P in Definition 1. We can then use Lemma 1 to replace the losses with those w.r.t. Q.

In the final step, we use the following formulation of the Catoni bound using (Germain et al., 2009, Proposition 2.1), valid if  $\epsilon$  is independent of the sample S and  $\hat{L}_{\gamma}(Q) = 0$ :

$$\operatorname{kl}(\epsilon: L(Q) - \epsilon) \leq \frac{1}{m} \left( \operatorname{KL}(P, P_0) + \log \frac{1}{\delta} \right)$$

and adapt it in the same way as the previous bounds to  $\kappa$ . We then use the lower bound  $\operatorname{kl}(\epsilon: p-\epsilon) \geq p + 4\epsilon \log \epsilon$ , valid for all  $\epsilon \in [0, \frac{1}{2}], p \in [0, 1]$ , proved as follows: note that  $-\log(p-\epsilon) \geq 0$  if  $p \leq 1$  and thus  $\epsilon \log \frac{\epsilon}{R-\epsilon} \geq \epsilon \log \epsilon$ , then show that  $(1-\epsilon) \log \frac{1-\epsilon}{1+\epsilon-R} \geq R-2\epsilon$  using the bound  $\log x \leq x-1$ ; these show that  $\operatorname{kl}(\epsilon: p-\epsilon) \geq p + \epsilon(\log \epsilon - 2)$ ; use the bound  $\epsilon(\log \epsilon - 2) \geq 4\epsilon \log \epsilon$  in the specified range to complete the proof.  $\Box$ 

**Remark.** In later proofs, we will choose  $\epsilon \in O(1/m)$  to ensure correct asymptotic behaviour. We will also sometimes relax the small-kl bound using lower bounds, including Pinkser's inequality,  $2(p-q)^2 \leq \text{kl}(q:p)$ .

#### 2.3 Relation to total variation and covering

This framework is closely related to the total variation distance, and covering numbers. Firstly, the zero-margin approximate variation,  $AV_0(P,Q)$ , is equal to the total variation distance between the distributions on margins,  $\delta_{TV}(M(P,z), M(Q,z)) \leq \delta_{TV}(P,Q)$ . However the total variation distance is too strict to yield non-vacuous bounds in most cases where  $P \neq Q$ .

Alternatively, with certain choices of prior we can obtain a "covering" approach: call  $N_{\gamma}$ a  $\gamma$ -net of  $\mathcal{H}$ , if for any  $f \in \mathcal{H}$ , there exists  $g \in N_{\gamma}$  such that  $|M(f,z) - M(g,z)| \leq \gamma$  for all  $z \in \mathcal{Z}$ . If we choose a prior supported everywhere on a  $\gamma/2$ -net for  $\mathcal{H}$ , we can achieve  $AV_{\gamma}(P,Q) = 0$  for any  $Q \in \mathcal{M}_1(\mathcal{H})$ , including Q supported on just a single hypotheses. The simplest approach chooses  $P_0$  as uniform on these points so that

$$\kappa(Q, P_0; \gamma, 0) \le \log |N_{\gamma/2}|$$

where  $|N_{\gamma/2}|$  is the cardinality of the net. We note however that such bounds will typically be dependent on the dimension of the parameter space, which some of our later theorems avoid.

#### 2.4 Sub-Gaussian derandomisation

Another simple case to which the above bounds can be applied, often in a dimensionindependent way, is that of total derandomisation by *averaging*: for some P, we set  $Q = \delta(F_P)$ , a point mass measure on the P-aggregate function  $F_P(x) := \mathbb{E}_{f \sim P} f(x)$ . If the score does not vary too much under P, as defined by a sub-Gaussian condition, derandomised PAC-Bayes bounds follow.

First we define the idea of sub-Gaussian random functions, defined here in a slightly more general way to accommodate "partial-derandomisation" as defined later.

**Definition 2.** We say a coupling  $\pi \in \Pi(P,Q)$  is  $\sigma^2$ -sub-Gaussian on  $\mathcal{Z}$  if

$$\mathbb{E}_{(f,q)\sim\pi}\exp(t(f(x)[y] - g(x)[y])) \le \exp(t^2\sigma^2/2)$$

and  $E_{f\sim P}f(x)[y] = E_{g\sim Q}g(x)[y]$ , for all  $t \in \mathbb{R}$ ,  $(x, y) \in \mathcal{Z}$ . The square bracket indicates the yth index if the output is multi-dimensional; in the scalar case we remove it.

We will further stretch this definition and call a *single* distribution, P,  $\sigma^2$ -sub-Gaussian, if the trivial coupling  $\pi = P \otimes \delta(F_P)$  is. Sub-Gaussianity implies bounds on the approximate variation:

**Lemma 2.** If  $\pi \in \Pi(P,Q)$  is  $\sigma^2$ -sub-Gaussian on  $\mathcal{Z} = \mathcal{X} \times \mathcal{Y}$ ,

$$AV_{\gamma}(P,Q) \leq \begin{cases} \exp(-\gamma^2/8\sigma^2) & \text{for } \mathcal{Y} = \mathbb{R} \text{ (binary classification)} \\ \exp(-\gamma^2/16\sigma^2) & \mathcal{Y} = \mathbb{R}^c \text{ (multi-class classification)} \end{cases}$$

*Proof.* Considering the zero-mean random variable X = f(x)[y] - g(x)[y] for  $(f,g) \sim \pi$  ( $\sigma^2$ -sub-Gaussian) and fixed  $(x, y) \in \mathbb{Z}$ , the Chernoff bound (see Boucheron et al., 2013, for example, for a thorough introduction to sub-Gaussianity), immediately implies

$$\mathbb{P}(X > t) \lor \mathbb{P}(-X > t) \le e^{t^2/2\sigma^2}$$

for all t > 0. In the binary margin case, M(f, z) = yf(x) which is either f(x) or -f(x); setting  $t = \gamma/2$  in the above therefore gives the bound.

In the multi-class case we consider the upper bound obtained by letting y' achieve the maximum margin for g; then  $M(f, z) \leq f(x)[y] - f(x)[y']$ , so

$$\mathbb{P}_{(f,g)\sim\pi}\left\{M(f,z) - M(g,z) > \frac{\gamma}{2}\right\} \le \mathbb{P}_{(f,g)\sim\pi}\left\{f(x)[y] - f(x)[y'] - g(x)[y] + g(x)[y'] > \frac{\gamma}{2}\right\}.$$

Since both f(x)[y] - g(x)[y] and f(x)[y'] - g(x)[y'] are  $\sigma^2$ -sub-Gaussian, their sum is  $2\sigma^2$ -sub-Gaussian and the bound follows by repeating the process on with signs reversed.  $\Box$ 

# 3 Linear prediction bound

Here we demonstrate our framework in action by deriving generalisation bounds for linear predictors under the  $L_2$  norm (as in the SVM) and the  $L_1$  norm (as in boosting). These bounds both essentially follow from an initial Gaussian assumption combined with the sharp (sub-Gaussian) concentration of the predictor output around its mean.

 $L_2$ -normed linear predictors This situation has been considered by a large number of papers, from Bartlett and Shawe-Taylor (1998, Theorem 1.7, using Fat-Shattering) in the fast-rate or interpolating case, to Bartlett and Mendelson (2002, Theorem 22, using Rademacher complexity) in the "soft-margin" case. McAllester (2003) presents alternative bounds in the "soft-margin" case, and is itself an attempt to find a expression for the implicit PAC-Bayesian result of Langford and Shawe-Taylor (2003).

We give bounds for both cases, through a proof similar to the method of Langford and Shawe-Taylor (2003), but using a different base PAC-Bayesian bound. This makes solving the interpolating hard-margin scenario of Bartlett and Shawe-Taylor (1998) more straightforward. In this (hard margin) case it improves on the order by a factor of  $O(\log m)$ , matching the lower bound of Grønlund et al. (2020, Theorem 4).

In the "soft-margin" case we give a bound of the same order as the state-of-the-art bound given by Grønlund et al. (2020) but with explicitly stated constants; the proof follows an almost identical method to our hard-margin bound. We emphasise the simplicity of this proof compared to that given by Grønlund et al. (2020), and that these are the tightest explicitly-stated bounds for the problem to our knowledge.

**Theorem 2.** In the binary classification setting with  $\mathcal{X}$  a Hilbert space with  $||x||_2 \leq R$ ,  $m \geq 8$ , and  $\delta \in (0,1)$ , with probability  $\geq 1 - \delta$  over  $S \sim D^m$ , for all linear predictors  $F_w(x) = \langle w, x \rangle$  with  $||w||_2 \leq 1$  and all  $\gamma > 0$  ("soft-margin"),

$$L(F_{\boldsymbol{w}}) \leq \hat{L}_{\gamma}(F_{\boldsymbol{w}}) + \sqrt{\frac{\hat{L}_{\gamma}(F_{\boldsymbol{w}}) \cdot \Delta}{m}} + \frac{\Delta + \sqrt{\Delta} + 2}{m},$$

where we define  $\Delta := 2\log(2/\delta) + 9(R/\gamma)^2 \log m$ . Additionally, under the same conditions and probability, provided  $\gamma_{\star} = \min\{\gamma > 0 : \hat{L}_{\gamma}(F_w) = 0\}$  exists ("hard-margin"),

$$L_0(F_w) \le \frac{8(R/\gamma_\star)^2 \log m + \log(1/\delta)}{m}.$$

Proof. Without loss of generality assume R = 1. To consider a free choice of margin  $\gamma$ , we note the scaling property  $\mathbf{1}\{M(F_{\boldsymbol{w}},z) \leq \gamma\} = \mathbf{1}\{M(F_{(\theta/\gamma)\boldsymbol{w}},z) \leq \theta\}$ . This suggests approximating the mean predictor  $F_{(\theta/\gamma)\boldsymbol{w}}$  by the distribution P over functions  $f = \langle \boldsymbol{u}, \boldsymbol{x} \rangle$  for  $\boldsymbol{u} \sim \mathcal{N}((\theta/\gamma)\boldsymbol{w}, \boldsymbol{I})$ . Choosing a data-free prior  $P_0$  of a similar form, but with  $\boldsymbol{u} \sim \mathcal{N}(\mathbf{0}, \boldsymbol{I})$  gives a divergence  $\mathrm{KL}(P, P_0) = \frac{1}{2} ||(\theta/\gamma)\boldsymbol{w}||^2 = \theta^2/2\gamma^2$ .

P is 1-sub-Gaussian, so by Lemma 2,  $AV_{\theta}(P, \delta(F_{(\theta/\gamma)w})) \leq \exp(-\theta^2/8) = \epsilon$ . Plugging into (the hard-margin) Theorem 1 we obtain for a fixed  $\theta^2 = 8 \log m$  and all  $\gamma_{\star}$  such that  $\hat{L}_{\gamma_{\star}}(F_w) = 0$ ,

$$L(F_{\boldsymbol{w}}) \le \frac{\theta^2 / 2\gamma_{\star}^2 + \log \frac{1}{\delta}}{m} + \frac{1}{2}\theta^2 \exp(-\theta^2 / 8) \le \frac{4(1 + 1/\gamma_{\star}^2)\log m + \log \frac{1}{\delta}}{m}.$$

By the assumptions on  $\|\boldsymbol{w}\|_2$  and R, we have  $\gamma_{\star} \leq 1$  to prove the second statement.

Repeating the above but replacing the use of the hard-margin bound with the small-kl formulation in Theorem 1 (and using the vacuity of the bound when  $\gamma > 1$ ), we have the tight bound

$$kl(\hat{L}_{\gamma} + m^{-1} : L - m^{-1}) \le \frac{1}{m} \left( 4(R/\gamma)^2 \log m + \frac{1}{2} \log m + \log \frac{2}{\delta} \right) \le \frac{\Delta}{2m}$$
(2)

with probability  $\geq 1 - \delta$ . To relax the above we use the lower bound  $kl(q:p) \geq (p-q)^2/(2p)$ for p > q from McAllester (2003) to show  $L \leq \hat{L}_{\gamma} + 2m^{-1} + \sqrt{(\hat{L}_{\gamma} + m^{-1}) \cdot \Delta/m} + \Delta/m$ which completes the proof.

**Remark.** We note here that the margin only appears in the bounds of Theorem 2 in a "normalised" form,  $\gamma/R$ , otherwise scaling the data would affect the bound. The "soft-margin" case is given in the more straightforward form above, even though Equation (2) is technically tighter, so comparison can be made with that given in Grønlund et al. (2020). It is true universally across  $\gamma > 0$ , allowing the bound can be optimised for  $\gamma$  in O(m) time. If the margin is large for most examples, we can choose  $\gamma$  so that  $\hat{L}_{\gamma}$  is small and thus the  $\Delta/m$  term (which is of the same order as the hard-margin bound) dominates. Since the minimum margin can be sensitive to outliers, this bound will often be tighter than the hard-margin one.

 $L_1/L_{\infty}$ -normed linear predictors. Theorem 2 is a bound under  $L_2$  norms for  $\mathcal{X}$  and w, applying to situations such as the SVM. We also provide here for completeness a bound for linear classification under different norm constraints, where the  $L_1$  norm of the weights and  $L_{\infty}$  norm of the features is restricted, as in boosting. This bound is very similar to k-th margin bound of Gao and Zhou (2013), but proved through our framework instead. The fundamental proof idea (which is different from that of Theorem 2) is to approximate our predictor by a randomised, unweighted, sum of features, as originally proposed by Schapire et al. (1998). As this proof (provided in Appendix B) is somewhat similar to the proof of Theorem 5 in the next section, we hope that it can provide some extra intuition for the technique.

**Theorem 3.** In the binary classification setting with  $\mathcal{X} \subset \mathbb{R}^K$  such that  $||x||_{\infty} \leq R$ , for any  $\delta \in (0,1)$ ,  $m \geq 8$ , and  $\gamma > 0$ , with probability  $\geq 1 - \delta$  over  $S \sim D^m$ , for all linear predictors  $F_w(x) = \sum_{k=1}^K w_k x_k$  with  $||w||_1 \leq 1$ 

$$L(F_{\boldsymbol{w}}) \leq \hat{L}_{\gamma}(F_{\boldsymbol{w}}) + \sqrt{\frac{\hat{L}_{\gamma}(F_{\boldsymbol{w}}) \cdot \Delta}{m}} + \frac{\Delta + \sqrt{\Delta} + 2}{m},$$

where we define  $\Delta := 2\log(2/\delta) + 19(R/\gamma)^2\log(2K)\log m$ .

#### 4 Partial derandomisation

Bounds of a similar form to Theorem 2 can also be used in another interesting situation: where before linear prediction we apply a feature map, as commonly done in the SVM. If  $\phi \in \Phi \subset \{f : \mathcal{X} \to \mathcal{X}^{\dagger}\}$  (so that  $\mathcal{X}^{\dagger}$  is a Hilbert space and  $\mathcal{X}$  an arbitrary set) is the map, our predictor is of the form  $\langle w, \phi(x) \rangle$ . Theorem 2 then applies with only the modification that R is a bound on  $\|\phi(x)\|_2$  instead of  $\|x\|_2$ .

In certain cases we may wish to *learn* these (perhaps randomised) features in parallel with w. In this case the usual PAC-Bayesian analysis would generally fail without making both w and the map  $\phi$  random. The generality of coupling and approximations as outlined in Section 2 here comes to the fore; we can "partially derandomise" or derandomise w while  $\phi$  is still randomised.

More formally, let  $Q^{\Phi} \in \mathcal{M}_1(\Phi)$  be a probability measure on feature maps so that the posterior Q is a distribution on functions of the form  $f(\phi(x))$  for  $\phi \sim Q^{\Phi}$  and deterministic  $f: \mathcal{X}^{\dagger} \to \mathcal{Y}$ . The approximating P distribution can then take the form  $g(\phi'(x))$  for  $g \sim P^g$ and  $\phi' \sim Q^{\Phi}$ , the same random feature map. Provided the  $P^g$  and  $Q^{\Phi}$  distributions are independent, the KL divergence from prior  $P_0$  separates into terms like KL  $(P, P_0) =$ KL  $(P^g, P_0^g) + \text{KL}(Q^{\Phi}, P_0^{\Phi})$ . Using this fact and that such mappings do not affect the sub-Gaussianity of our predictors, we obtain the following results, analogous to Theorem 2, but applicable under learned and potentially randomised feature maps.

**Lemma 3.** There is a 1-sub-Gaussian coupling between functions defined by  $h(x) = \langle w, \phi(x) \rangle$ and  $h'(x) = \langle w + g, \phi'(x) \rangle$  where  $g \sim \mathcal{N}(\mathbf{0}, \mathbf{I})$  and  $\phi, \phi' \sim Q^{\Phi}$  independent of g, provided  $\|\phi\|_2 \leq 1$  almost surely  $[Q^{\Phi}]$ .

*Proof.* We use a coupling  $\pi$  such that  $\phi = \phi'$ , so that

$$\mathbb{E}_{(h,h')\sim\pi} \exp(t(h(x) - h'(x))) = \mathbb{E}_g \mathbb{E}_{\phi\sim Q^\Phi} \exp(t(\langle w, \phi \rangle - \langle w + g, \phi \rangle))$$
$$= \mathbb{E}_{\phi\sim Q^\Phi} \exp(t^2 \|\phi\|_2^2/2) \le \exp(t^2/2)$$

where we use the moment generating function of a standard multivariate Gaussian.  $\Box$ 

**Theorem 4.** In the binary classification setting, let  $\Phi$  be a space of bounded functions  $\phi : \mathcal{X} \to \mathcal{X}^{\dagger}$  where  $\mathcal{X}^{\dagger}$  is a Hilbert space with  $\|\phi\|_2 \leq 1$  everywhere. For any prior  $P_0^{\Phi} \in \mathcal{M}_1(\Phi)$  and  $\delta \in (0,1)$ , with probability  $\geq 1 - \delta$  over  $S \sim D^m$ , for all prediction distributions Q of the form  $f(x) = \langle w, \phi(x) \rangle$  with  $\|w\|_2 \leq 1, \phi \sim Q^{\Phi} \in \mathcal{M}_1(\Phi)$ ,

$$L(Q) \leq \hat{L}_{\gamma}(Q) + \sqrt{\frac{\hat{L}_{\gamma}(F_{\boldsymbol{w}}) \cdot \Delta}{m}} + \frac{\Delta + \sqrt{\Delta} + 2}{m}$$

where  $\Delta := 2\log(2/\delta) + 9(R/\gamma)^2\log m + 2\operatorname{KL}\left(Q^{\Phi}, P_0^{\Phi}\right)$ .

(Sketch of proof). Use Lemma 3 in the proof of the second part of Theorem 2 to obtain 1-sub-Gaussianity, adding the extra KL contribution from the feature map.  $\Box$ 

Such a bound could be used to derandomise the final layer of neural networks with a bounded (e.g. tanh) activation functions on the penultimate layer and randomised weights on the rest of the structure. In the next section we will take this approach further and derandomise the final *two* layers through margins, which can be straightforwardly used to obtain a bound on one-hidden-layer networks. In conjunction with the above ideas it yields bounds for deep stochastic networks with the final two layers derandomised.

#### 5 Averaging one-hidden-layer networks

In this section we prove generalisation bounds for a one-hidden-layer neural network (possibly with a randomised input feature map) with a slightly unusual erf activation function that looks much like a tanh or other sigmoidal-type function as more commonly used.

This choice allows us to exploit two helpful properties: firstly the boundedness of the erf function, which allows almost-trivial extension to partial derandomisation, with most terms staying the same; and secondly that the erf is the expected sign of a Gaussian random variable (as utilised by Germain et al., 2009 and more recently by Letarte et al., 2019). The former will enable empirical comparisons with deeper networks on more complex datasets. We thus hope this can form a stepping stone between totally-randomised PAC-Bayesian bounds and non-random margin bounds, and help gain a better understanding of one-hidden-layer network generalisation.

**Definition 3.** Single Hidden Erf Layer (SHEL) Network: Given  $V \in \mathbb{R}^{c \times K}$  and  $U \in \mathbb{R}^{K \times d}$ , this is the neural network  $F : d \to c$  defined by

$$F_{U,V}(x) = V \operatorname{erf}\left(\frac{Ux}{\sqrt{2}\|x\|_2}\right)$$
(3)

where the erf activation function is applied elementwise. We also consider the "binary" case, where V is a vector,  $v \in \mathbb{R}^{K}$ .

The generalisation bound for this depends on a set of prior parameters (or "random features"),  $U_0$ , chosen independently of the training data, for example the initialisation of the network (this choice has been extensively discussed in the literature, beginning with Dziugaite and Roy, 2017).

**Theorem 5.** Fix prior parameters  $U^0 \in \mathbb{R}^{K \times d}$ ,  $m \ge 8$  and  $\delta \in (0,1)$ . With probability  $\ge 1 - \delta$  over  $S \sim \mathcal{D}^m$ ,

$$L(F_{U,V}) \leq \hat{L}_{\gamma}(F_{U,V}) + \tilde{O}\left(\frac{\sqrt{K}}{\gamma\sqrt{m}} \left(V_{\infty} \|U - U^0\|_F + \|V\|_F\right)\right),$$

for any margin  $\gamma > 0$  and any prediction function  $F_{U,V}$  specified as in Equation (3) with parameters U, V, and  $V_{\infty} := \max_{ij} V_{ij}$ . A full (tighter) expression with constants is given in the proof in Appendix C.

**Remark.** At first glance this bound might appear to grow with width, since although the norm terms are usually seen to be roughly constant under increasing K, the  $\sqrt{K}$  term is obviously not. However the range of the network (and thus maximum margin) is bounded by  $KV_{\infty}$ , so provided the margin per-unit remains constant, the bound would actually decrease with K.

To emphasise this, we note that the above bound is unchanged under two simple transformations, which ensures dimensional consistency (if it were not, we could perform these operations to obtain a possibly arbitrarily tight bound). (1) Scale V; the bound and norm term exactly cancel since we can scale  $\gamma$  by the same amount and obtain the same empirical margin loss. (2) Double the width of network, with exact copies of weights in the copy: we can again double  $\gamma$  for a fixed margin loss, while the squared norms also double.

**Proof outline.** The central idea underlying the proof is the construction of a stochastic neural network with Equation (3) as its average. We replace the normal distribution of Equation (1) with a *mixture* of isotropic Gaussians: if the mixture weights are uniform and their means are given by the columns of U (notated as the set  $\{U_1, \ldots, U_{K_i}\}$ ), we note that

$$\mathbb{E}_{i \sim \text{Unif}(K), w \sim \mathcal{N}(U_{i;\cdot}, I)} \operatorname{sign}(w \cdot x) = \sum_{k=1}^{K} \operatorname{erf}\left(\frac{U_{k;\cdot} \cdot x}{\sqrt{2} \|x\|_2}\right)$$
(4)

which is directly proportional to one of the output components of the SHEL network F. To obtain the final layer weights we multiply the sign by a random vector r supported on  $\{+1, -1\}^c$  and re-scale everything to fit the scale of the SHEL network. We could instead have used non-uniform mixture weights; this approach is leads to a somewhat different bound (using the  $L_1$  norm for the final layer) for binary classification, examined in Appendix F.

We note that the above is also sub-Gaussian as it is a bounded random variable for any fixed z. To obtain control over the constant and thus  $\epsilon$ , we average over a number of copies of the network, an approach inspired by the approach of Schapire et al. (1998) or Langford and Seeger (2001), but for a hidden-layer network. Combination with Theorem 1, careful bounding of the KL divergence of such hierarchical distributions, and a union bound over margin values completes the proof.

**Generalisation to bounded functions and partial derandomisation.** We note that in the proof of Theorem 5 we can replace the sign activation functions used in the proxy function distribution by any bounded activations, for example sigmoid. Indeed, any feature map which is bounded and independent from the final layer is possible. The caveat is that the obtained networks have modified activation functions which may not be analytically tractable. A more straightforward extension to deep networks follows through the partial derandomisation framework discussed in Section 4; the boundedness of the activation then means the theorem and proof hold with only slight modification.

**Empirical evaluation.** Although the main contribution of this paper is in the refinement of methods for proving PAC-Bayes margin bounds, in Appendix E we also make some empirical evaluations of Theorem 5, and a partially deranmonised generalisation of it. Training to a fixed cross-entropy and margin loss (as in Jiang et al., 2020), we examine changes in the big-O complexity measure in Theorem 5 versus generalisation error under hyperparameter changes in both cases. This complexity measure is predictive under training set size changes and somewhat predictive under learning rate changes, but like most such measures (Dziugaite et al., 2020), it is not predictive under changes of width, implying the per-unit margin decreases significantly with width.

### 6 Beyond two layers

Finally, we give a bound for deep feed-forward ReLU networks, similar in form and proof to that given of Neyshabur et al. (2018). Although the new result shares the same shortcomings (as discussed in, for example, Dziugaite et al., 2020), we hope our simplified proof and unifying perspective will help clear the way for future improvements.

The new bound also replaces a factor of d, the number of layers, with one of  $\sqrt{\log m}$ , while the proof is simplified by merely requiring  $AV_{\gamma} \in O(m^{-1})$  rather than  $AV_{\gamma} = 0$  as in the original. Bounding this term for simple Gaussian weights with the same perturbation bound as their proof, gives a simple form for KL divergence. Combination with Theorem 1 and a cover of different weight variances and margins completes the proof, given in Appendix D.

**Theorem 6.** Let  $F : \mathcal{X} \to \mathbb{R}^c$  on  $\mathcal{X} = \{x \in \mathbb{R}^d : ||x||_2 \leq R\}$  be a fully-connected, feedforward ReLU neural network with d layers and no more than h units per layer. For fixed  $\delta \in (0,1), W_{\star} > 0$  and prior weight matrices  $\{W_i^0\}_{i=1}^d$ , with probability at least  $1 - \delta$  for all such networks F with weight spectral norms  $||W_i||_2 \leq W_{\star}$  for all i, and  $\theta > 0$ , L(F) is upper bounded by

$$\hat{L}_{\theta}(F) + O\left(\sqrt{\frac{hR^2\left(\prod_{i=1}^{d} \|W_i\|_2^2\right)\log(mdh)}{\theta^2 m}} \cdot \sum_{i=1}^{d} \frac{\|W_i - W_i^0\|_F^2}{\|W_i\|_2^2} + \frac{\log\frac{1}{\delta} + d\log\log W_{\star}}{m}\right).$$

**Remark** A second difference between Theorem 6 and the bound of Neyshabur et al. (2018) is the appearance of the prior matrices (to bring the bound into line with others which often set these to the initialisation) and the norm bound  $W_{\star}$ . This  $W_{\star}$  term arises from these prior matrices and can be eliminated if the prior matrices are set to zero, since re-scaling the weights and margins will then not affect the bound (due to the positive homogeneity of the ReLU,  $||W_i||_2/\theta = ||\tilde{W}_i||_2/\tilde{\theta}$  and  $||W_i||_F/||W||_2 = ||\tilde{W}_i||_F/||\tilde{W}||_2$  for re-scaled  $\tilde{W}_i$  and  $\tilde{\theta}$ ).

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# A PAC-Bayes bounds

Here we give three different PAC-Bayesian bounds for losses in [0, 1], as used in the proof of Theorem 1. We also define the convenience function (for  $C > 0, p \in [0, 1]$ )

$$\Phi_C(p) = -\frac{1}{C}\log(1 - p + pe^{-C})$$

which has inverse

$$\Phi_C^{-1}(t) = \frac{1 - e^{-Ct}}{1 - e^{-C}}.$$

**Theorem 7.** Given data distribution  $\mathcal{D}$  on  $\mathcal{X} \times \mathcal{Y}$ ,  $m \geq 8$ , prior  $P_0 \in \mathcal{M}^1(\mathcal{H})$ , C > 0 and  $\delta \in (0,1)$ , the following hold each with probability  $\geq 1 - \delta$  over  $S \sim D^m$ , for all  $Q \in \mathcal{M}^1(\mathcal{H})$ "small-kl" (Langford and Seeger (2001), with improvement by Maurer (2004))

$$\operatorname{kl}(\hat{L}(Q):L(Q)) \leq \frac{1}{m} \left(\operatorname{KL}(Q,P_0) + \log \frac{2\sqrt{m}}{\delta}\right)$$

"Catoni" (Catoni, 2007)

$$L(Q) \le \Phi_C^{-1} \left( \hat{L}(Q) + \frac{\operatorname{KL}(Q, P_0) + \log \frac{1}{\delta}}{Cm} \right)$$

For completeness, we also include here Proposition 2.1 from Germain et al. (2009).

Lemma 4. For any  $0 \le q \le p < 1$ ,

$$\sup_{C>0} \left[ C\Phi_C(p) - Cq \right] = \mathrm{kl}(q:p).$$

# **B** Linear classification with $L_1/L_{\infty}$ norms

Proof of Theorem 3. Without loss of generality (since we can always simultaneously re-scale the margin and these) we consider R = 1. For simplicity we will also assume initially that the weights are non-negative; negative weights can later be included through the standard method of doubling the dimension.

Our prediction function then has the form  $F(x) = \sum_{k=1}^{K} w_k x_k$ . For a fixed margin  $\theta > 0$ , we approximate this by unweighted averages of the form

$$f(x) = \frac{1}{T} \sum_{t=1}^{T} x_{d(t)}$$

where the indices  $d(t) \sim P$  for some distribution P over [K]. When T such indices are drawn, we denote this distribution over functions by  $P^T$ . As an average of T independent bounded variables,  $P^T$  is (1/T)-sub-Gaussian with mean F, and thus by Lemma 3

$$\operatorname{AV}_{\theta}(P^T, \delta(F)) \le e^{T\theta^2/8} = \epsilon.$$

Choosing  $P_0$  as a uniform distribution on [K] and  $P_0^T$  as T independent copies of this, we see that

$$\mathrm{KL}\left(P^{T}, P_{0}^{T}\right) = T \,\mathrm{KL}\left(P, P_{0}\right) = T \left(\log K - H[w]\right) \le T \log K$$

where H[w] is the entropy of a categorical variable with (normalised) weights w. This expression using H[w] could be explicitly used (or with a non-uniform prior) to improve the bound, as in Seeger et al. (2001); we will ignore this here and just use the upper bound.

Setting  $T = \left\lceil 8\theta^{-2} \log m \right\rceil$  in the small-kl formulation of Theorem 1, we obtain that

$$\operatorname{kl}(\hat{L}_{\gamma} + m^{-1} : L - m^{-1}) \leq \frac{1}{m} \left( \left\lceil 8\theta^{-2} \log m \right\rceil \log K + \frac{1}{2} \log m + \log \frac{2}{\delta} \right) \leq \frac{\Delta}{2m}$$
(5)

with probability at least  $1 - \delta$ .  $\Delta := 19\theta^{-2} \log K \log m + 2\log(2/\delta)$ , since  $\theta^{-2} \ge 1$  and  $m \ge 2$  for a non-vacuous bound.

Relaxing using the lower bound  $kl(q:p) \ge (p-q)^2/(2p)$  for p > q as in the proof of Theorem 2, we obtain  $L \le \hat{L}_{\gamma} + 2m^{-1} + \sqrt{(\hat{L}_{\gamma} + m^{-1}) \cdot \Delta/m} + \Delta/m$ . To complete the proof, we allow negative weights by doubling the dimensions.

# C Proof of Theorem 5

We begin by stating the following useful lemma.

**Lemma 5.** Let  $X \in \mathcal{M}^1(\{+1, -1\})$  be a random variable with  $\mathbb{E}[X] = x$ , and

 $h(x) := KL(X, Uniform(\{+1, -1\}))$ 

the KL divergence from a uniform prior. Then

$$h(x) = \frac{1}{2} \left[ (1+x) \log(1+x) + (1-x) \log(1-x) \right] \le x^2 \log 2$$

*Proof.* The second equation is simply an explicit statement of the KL divergence. It is easy to see from convexity that  $h(x) \leq x^2$ ; the improved (and optimal) constant of log 2 requires a more complex argument, as follows.

Calculation gives the Maclaurin series

$$(1+x)\log(1+x) + (1-x)\log(1-x) = x^2 + \sum_{n=2}^{\infty} \frac{x^{2n}}{n(2n-1)}$$

which has a radius of convergence of 1. Therefore

$$h(x)/x^2 = \frac{1}{2} + \frac{1}{2} \sum_{n=2}^{\infty} \frac{x^{2n}}{(n+1)(2n+1)}$$

which is an increasing function on (0, 1) with supremum log 2. From the definition,  $x \in [-1, 1]$ . A similar argument applies for (-1, 0) and equality is achieved at x = 0, so the inequality holds (and is the tightest possible).

Proof of Theorem 5. Let P be a probability measure on  $\mathbb{R}^d \times \{+1, -1\}^c$  defined by the following hierarchical procedure: draw a mixture component  $k \sim \text{Uniform}(K)$ ; then  $\boldsymbol{w} \in \mathbb{R}^d$  from a Gaussian  $\mathcal{N}(U_{k,\cdot}, I)$  (with mean vector as a row of U) and for  $i \in [c]$  draw a component of  $\boldsymbol{r} \in \{+1, -1\}^c$  such that  $\mathbb{E}\boldsymbol{r}[i] = V_{ik}/V_{\infty}$ . A sample from P is a tuple  $(\boldsymbol{w}, \boldsymbol{r})$ .

 $P^T$  is then defined for  $T \in \mathbb{N}$  as a distribution on functions  $f : \mathbb{R}^d \to \mathbb{R}^c$ , of the following form:

$$f(\boldsymbol{x}) = \frac{1}{T} \sum_{t=1}^{T} \operatorname{sign}(\boldsymbol{w}^t \cdot \boldsymbol{x}) \boldsymbol{r}^t$$

for T independently drawn samples  $(\boldsymbol{w}^t, \boldsymbol{r}^t) \sim P$ . It is straightforward to see that  $F(\boldsymbol{x}) = V_{\infty}K \cdot \mathbb{E}_{P^T}[f(\boldsymbol{x})]$  and therefore  $L_{\theta'}(F) = L_{\theta}(\mathbb{E}[f])$  where  $\theta' = \theta V_{\infty}K$ . Further, since  $P^T$  is the average of T independent bounded variables for any fixed  $\boldsymbol{x}$ , it is (1/T)-sub-Gaussian.

Thus, for any fixed  $T, \theta > 0$  and prior  $P_0^T$ , we have by Theorem 1 and Lemma 2 that

$$\mathrm{kl}(\hat{L}_{\theta'}(F) + e^{-T\theta^2/16} : L(F) - e^{-T\theta^2/16}) \le \frac{1}{m} \left( \mathrm{KL}\left(P^T, P_0^T\right) + \log \frac{2\sqrt{m}}{\delta} \right).$$

We now define a prior distribution on individual parameters  $P_0$ , and functions  $P_0^T$ , in a similar way, but with the distribution over each component of  $\boldsymbol{r}$  uniform on  $\{+1, -1\}$ , and the Gaussian mixture means as rows of the data-free matrix  $U^0$ . Since the samples are independently drawn and the distributions  $P, P_0$  over parameters imply those over functions,  $\operatorname{KL}(P^T, P_0^T) \leq T \operatorname{KL}(P, P_0)$ .

 $P_0$  and P can be seen as distributions on  $([K] \times \mathbb{R}^d \times \{+1, -1\}^c)$  with the index  $k \in [K]$  marginalised out. From the chain rule for conditional entropy and Lemma 5, (in a slight abuse of notation since  $P_0, P$  are not necessarily densities)

$$\begin{split} \operatorname{KL}\left(P(\boldsymbol{w},\boldsymbol{r}),P_{0}(\boldsymbol{w},\boldsymbol{r})\right) &\leq \operatorname{KL}\left(P(k,\boldsymbol{w},\boldsymbol{r}),P_{0}(k,\boldsymbol{w},\boldsymbol{r})\right) \\ &= \operatorname{KL}\left(P(k),P_{0}(k)\right) + \operatorname{KL}\left(P(\boldsymbol{w},\boldsymbol{r}|k),P_{0}(\boldsymbol{w},\boldsymbol{r}|k)\right) \\ &= \operatorname{KL}\left(P(\boldsymbol{w},\boldsymbol{r}|k),P_{0}(\boldsymbol{w},\boldsymbol{r}|k)\right) \\ &= \operatorname{KL}\left(P(\boldsymbol{w}|k),P_{0}(\boldsymbol{w}|k)\right) + \operatorname{KL}\left(P(\boldsymbol{r}|k),P_{0}(\boldsymbol{r}|k)\right) \\ &= \frac{1}{K}\sum_{k=1}^{K}\frac{\|U_{k,\cdot} - U_{k,\cdot}^{0}\|_{2}^{2}}{2} + \frac{1}{K}\sum_{k=1}^{K}\sum_{i=1}^{c}h(V_{ik}/V_{\infty}) \\ &\leq \frac{\|U - U^{0}\|_{F}^{2}}{2K} + \frac{\|V\|_{F}^{2}}{V_{\infty}^{2}K}\log 2. \end{split}$$

For any fixed  $\theta = \gamma/(V_{\infty}K) > 0$  and m' > 2, we set  $T = \lfloor 16\theta^{-2} \log m' \rfloor$ . The following then holds with probability at least  $1 - \delta$ :

$$m \cdot \mathrm{kl}\left(\hat{L}_{\theta'}(F) + \frac{1}{m'} : L - \frac{1}{m'}\right) \le \left\lceil 16\theta^{-2} \log m' \right\rceil \left(\frac{\|U - U^0\|_F^2}{2K} + \frac{\|V\|_F^2}{V_\infty^2 K} \log 2\right) + \log \frac{2\sqrt{m}}{\delta}.$$

It remains to cover possible values of  $\theta$ . Firstly we note that for  $\theta \ge 1$  the bound is trivially true by the boundedness of  $f(\mathbf{x})$ , and thus we need only consider  $\theta^{-2} > 1$ .

For  $\alpha > 1$  and  $i = 0, 1, \ldots$ , set  $\theta_i = \alpha^{-i}$  and  $\delta_i = \delta/2(i+1)^2$ . Applying the union bound over the above equation with these parameters we get that with probability at least  $1 - (\pi^2/6)\delta \ge 1 - 2\delta$  that the above is true for each pair of  $\theta_i$  and  $\delta_i$ . We choose the largest  $\theta_i$  such that  $\theta_i \le \theta < \theta_{i-1}$ , so that  $i \le 1 - \log_a(\theta)$ . Since  $\hat{L}_{\theta} \le \hat{L}_{\theta_i}$  is increasing,  $1/\theta_i \le a/\theta$ , and  $\log(1/\delta_i) \le \log(1/\delta) + 2\log(2 + \log_a(1/\theta)) = \log(1/\delta) + 2\log(\log(\alpha^2/\theta)/\log(\alpha))$ , we finally obtain with probability  $1 - \delta$ 

$$\begin{split} m \cdot \mathrm{kl}\left(\hat{L}_{\gamma}(F) + \frac{1}{m'} : L - \frac{1}{m'}\right) \leq & 17\left(\frac{\alpha V_{\infty}K}{\gamma}\right)^2 \left(\frac{\|U - U^0\|_F^2}{2K} + \frac{\|V\|_F^2}{V_{\infty}^2 K}\log 2\right)\log m' \\ &+ \log\frac{4\sqrt{m}}{\delta} + 2\log\left(\frac{\log(\alpha^2 V_{\infty}K/\gamma)}{\log\alpha}\right) \end{split}$$

for all weight matrices and every  $\gamma > 0$ , and fixed  $K > 0, \alpha > 1$ .

Relaxing the bound with Pinsker's inequality  $kl(a:b) \ge (a-b)^2$  and setting m' = m and  $\alpha = 2$  completes the proof.

# D Proof of Theorem 6

Here we give the proof of Theorem 6, beginning with two lemmas used.

**Lemma 6** (Neyshabur et al., 2018; Lemma 2, Perturbation Bound.). In the setting of Theorem 6, for any layer weights  $W_i$ ,  $x \in \mathcal{X}$  and weight perturbations  $U_i$  such that  $||U_i||_2 \leq d^{-1}||W_i||_2$ ,

$$\|f(x) - F(x)\|_{2} \le eR\left(\prod_{i=1}^{d} \|W_{i}\|_{2}\right) \sum_{i=1}^{d} \frac{\|U_{i}\|_{2}}{\|W_{i}\|_{2}}$$

where F is the unperturbed and f the perturbed network (with weights  $W_i$  and  $W_i + U_i$  respectively).

**Lemma 7.** Let  $Q = \delta(F)$  for such a feed-forward ReLU network with weights  $W_i$ , and P be the same network with Gaussian weights, with per-layer means  $W_i$  and variances  $\sigma_i^2$ . Then for all  $0 < \theta < 2 \sup_{x \in \mathcal{X}, y \in [K]} |F(x)[y]|$ ,

$$AV_{\theta}(P,Q) \le 2h \sum_{i=1}^{d} \exp\left(-\frac{1}{32h} \left(\frac{\theta \|W_i\|_2}{\sigma_i eR(\prod_i \|W_i\|_2)}\right)^2\right)$$

*Proof.* From Lemma 6, we see immediately that if for all *i*, the perturbations have  $||U_i||_2 \le c\theta ||W_i||_2$  for  $c^{-1} = 4edR (\prod_i ||W_i||_2)$ , then  $||f(x) - g(x)||_2 \le \theta/4$ . The perturbation condition of Lemma 6 is satisfied if  $\theta < 2eR \prod_i ||W_i||_2$ , which is true for any  $\theta$  in the range of the function margins (as in the lemma assumption, since  $R \prod_i ||W_i||_2$  is an upper bound on the range). If the perturbations are randomised, we see that (letting  $y' \neq y$  achieve the maximum margin)

$$\begin{aligned} \operatorname{AV}_{\theta}(P,Q) &\leq \mathbb{P}\{|M(f,z) - M(g,z)| > \theta/2\} \\ &\leq \mathbb{P}\{|f(x)[y] - f(x)[y'] - g(x)[y] + g(x)[y']| > \theta/2\} \\ &\leq \mathbb{P}\{2\|f(x) - g(x)\|_{\infty} > \theta/2\} \\ &\leq \mathbb{P}\{\|f(x) - g(x)\|_{2} > \theta/4\} \\ &\leq \mathbb{P}\{\exists i : \|U_{i}\|_{2} > c\theta\|W_{i}\|_{2}\} \\ &\leq \sum_{i=1}^{d} \mathbb{P}\{\|U_{i}\|_{2} > c\theta\|W_{i}\|_{2}\}. \end{aligned}$$

We set the weights of g to be Gaussian with diagonal covariance, and per-layer variances of  $\sigma_i^2$ . To complete the proof we use a result of Tropp (2012) for Gaussian random matrices, that

$$\mathbb{P}\{\|U_i\|_2 > t\} \le 2he^{-t^2/2h\sigma_i^2}.$$

Proof of Theorem 6. We choose P and  $P^0$  to have Gaussian weight matrices with means  $W_i$ and  $W_i^0$ , and identical per-layer variances  $\sigma_i$ . From Lemma 7 we have for any fixed  $\theta$  and set of  $\sigma_i$ , and for all F with weights  $W_i$ , such that the inverse variances

$$\sigma_i^{-2} \ge 32h \left(\frac{eR(\prod_i \|W_i\|_2)}{\theta \|W_i\|_2}\right)^2 \log(mhd) \tag{6}$$

we have  $AV_{\theta} \leq 2/m$ . Therefore from Theorem 1 and Pinsker's inequality we have the generalisation bound (for the weight matrices and  $\theta$  satisfying the condition on the set of  $\sigma_i$ )

$$L(F) \le \hat{L}_{\theta}(F) + \frac{2}{m} + \sqrt{\frac{1}{2m} \left(\sum_{i=1}^{d} \frac{\|W_i - W_i^0\|_F^2}{\sigma_i^2} + \log \frac{2\sqrt{m}}{\delta}\right)}.$$

We complete the proof by constructing covers for  $\sigma_i$  and  $\theta$ . We only need to consider  $\theta < R \prod_i ||W_i||_2 =: C_{\theta}$  (an upper bound on the range of the function) as otherwise the  $\hat{L}_{\theta}$  term is 1 and the bound is vacuous. Since  $||W_i||_2 \le W_{\star}$  for all *i* we have that  $\sigma_i^{-2} \ge 32e^2h||W_i||_2^{-2} \ge 32e^2hW_{\star}^{-2}$  and  $\sigma_i \le 15h^{-1/2}W_{\star}^2 =: C_{\sigma}$ . For  $t = 0, 1, 2, \ldots$  choose margins  $\theta^{(t)} = C_{\theta}/2^t$  and let the bound for this margin hold with

For  $t = 0, 1, 2, \ldots$  choose margins  $\theta^{(t)} = C_{\theta}/2^t$  and let the bound for this margin hold with probability  $\delta^{(t)} = \delta/(t+1)^2$ , so that taking a union bound the above holds simultaneously for every  $\theta^{(t)}$  with probability at least  $1 - \pi^2 \delta/6 \ge 1 - 2\delta$ . To find a bound holding simultaneously for all  $\theta$ , we choose the t such that  $\theta^{(t)} \le \theta < \theta^{(t-1)}$ , and then replace this term with  $\theta$  by using the facts that  $\hat{L}_{\theta^{(t)}} \le \hat{L}_{\theta}, 1/\theta^{(t)} \le 2/\theta$ , and  $\log(1/\delta^{(t)}) \le \log(1/\delta) + 2\log\log_2(4C_{\theta}/\theta)$ .

Repeating this same covering process for every choice of  $\sigma_i$ , we obtain with probability at least  $1 - 2\delta$  simultaneously for all  $\theta, \sigma_i$  (and thus also for the tightest  $\sigma_i$  satisfying Equation (6)) that  $L(F) - \hat{L}_{\theta}(F)$  is upper bounded by

$$\frac{2}{m} + \sqrt{\frac{1}{2m} \left( 4\sum_{i=1}^{d} \frac{\|W_i - W_i^0\|_F^2}{\sigma_i^2} + \log \frac{2(d+1)\sqrt{m}}{\delta} + 2\log \log_2(4C_{\theta}/\theta) + \sum_{i=1}^{d} 2\log \log_2(4C_{\sigma}/\sigma_i) \right)} \\ \in O\left( \sqrt{\frac{hR^2 \left( \prod_{i=1}^{d} \|W_i\|_2^2 \right)\log(mdh)}{\theta^2 m}} \cdot \sum_{i=1}^{d} \frac{\|W_i - W_i^0\|_F^2}{\|W_i\|_2^2} + \frac{\log \frac{1}{\delta} + d\log \log W_{\star}}{m} \right)$$

# E Empirical Evaluation of Theorem 5

#### E.1 Experimental setup

All experiments were performed using the Tensorflow 2 library (Abadi et al., 2015) in Python, on a single workstation with a Nvidia RTX 2080 Ti GPU. Code for the results is licensed under an MIT license and available in the supplementary material.

We train SHEL networks and a partially-aggregated variation thereof under different hyperparameter configurations. We use this to compare changes in the generalisation error (the difference between test and train misclassification errors) with the complexity term from Theorem 5 given by

$$\frac{\sqrt{K}}{\gamma\sqrt{m}} \left( V_{\infty} \| U - U^0 \|_F + \| V \|_F \right).$$
(7)

Following previous empirical evaluations of such complexity terms, we train to a fixed value of cross-entropy; see Jiang et al. (2020) for further discussion. The margin  $\gamma$  is set as that giving a fixed  $L_{\gamma}(F) = 0.2$ , or  $E_{f\sim Q}L_{\gamma}(f) = 0.2$  for the partially aggregated version.

For the partially-aggregated version, we include a feature map of three additional dense ReLU layers with Gaussian weight matrices with independent components, means  $\{W_i\}_{i=1}^3$  and variances of  $\sigma$ . Again using the initialisation as a prior, this adds a term of  $\sqrt{\sum_{i=1}^3 ||W_i - W_i^0||_F^2/4m\sigma^2}$  to the right hand side of the bound. To enable comparison, we set  $\sigma$  to make this term constant and equal to a half when calculating  $E_{f\sim Q}L_{\gamma}(f)$ . This is done during the evaluation phase, and training is performed on the non-stochastic version (weights as means) as in Dziugaite and Roy (2017).

These experiments aim to evaluate the predictive ability of this complexity measure under changes of procedures. To this end we provide plots of the generalisation,  $G(\omega)$ , and complexity measure,  $C(\omega)$ , for trained parameters  $\omega$  versus some change in hyperparameter value.

We also provide evaluations using the sign-error, a measure of predictive power defined in Dziugaite et al. (2020) as

$$\frac{1}{2}\mathbb{E}_{\omega,\omega'}[1-\operatorname{sign}(C(\omega')-C(\omega))\cdot\operatorname{sign}(G(\omega')-G(\omega))]$$

where  $\omega$  and  $\omega'$  are parameters obtained through training with one changed hyperparameter between them. The maximum over such pairs of hyperparameter settings is a measure of the robustness of predictions made about the generalisation based on the complexity measure; if this value is low, the complexity measure makes robust predictions. We provide this maximum, the median, and the mean of the above (as in Jiang et al., 2020) for different setups and allowing different hyperparameters to vary.

#### E.2 SHEL Network

On the MNIST (LeCun et al., 2010) dataset, we examine the following hyperparameter settings, finding through the sign error (Table 1) that predictions under changes of training size are quite robust, while those under changes of learning rate or width are poor. We additionally provide plots (Figures 1 to 3) for some selected hyperparameter values to verify the above. This poor prediction under such changes is unfortunately a feature of many such complexity measures (Dziugaite et al., 2020).

- Learning rate  $\in \{10^{-3}, 3 \times 10^{-3}, 10^{-2}, 3 \times 10^{-2}, 10^{-1}\}.$
- Train set sizes  $\in \{60\,000, 30\,000, 15\,000, 7\,500\}.$
- Width  $\in \{50, 100, 200, 400, 800\}.$
- Batch size = 200.
- Learning algorithm SGD with momentum parameter = 0.9.

Variable Hyperparameter	Max SE	Median SE	Mean SE
Learning Rate	1.0	0.60	0.56
$\operatorname{Width}$	1.0	1.0	0.90
Train Size	0.2	0.0	0.00
All	1.0	0.60	0.53

Table 1: Statistics of the sign error, SE, under different varying hyperparameters for an SHEL network trained on MNIST.

#### E.3 Partially-Derandomised SHEL

Again on the MNIST dataset, we evaluate the partially-deranomised version of the above under the same hyperparameter values, excluding learning rates of 0.1 and 0.03 which sometimes led to numerical instability. Figures 4 to 6 provide sample results and the sign-error results are reported in Table 2.

These sign error results show that predictions under changes of training size are completely robust, while those under changes of learning rate or width are still poor. The predictions for width are somewhat improved, though we note that our estimate of this quantity may be somewhat noisy as the generalisation error appears largely independent of width.

### F Alternative SHEL Bound

Here we prove an alternative generalisation bound for the *binary classification* SHEL network. This version involves the  $L_1$ -normalised margin and the distances of the hidden units from their initialisations, weighted by their (relative) final weights, which measure their importance to our predictions. Firstly we give our bound and outline the main proof ideas.



Figure 1: Changes in complexity measure and generalisation error versus training set size under fixed other hyperparameters, for a SHEL network trained on MNIST.



Figure 2: Changes in complexity measure and generalisation error versus learning rate under fixed other hyperparameters, for a SHEL network trained on MNIST.



Figure 3: Changes in complexity measure and generalisation error versus width under fixed other hyperparameters, for an SHEL network trained on MNIST.



Figure 4: Changes in complexity measure and generalisation error versus training set size under fixed other hyperparameters, for an partially-derandomised SHEL network trained on MNIST.



Figure 5: Changes in complexity measure and generalisation error versus learning rate under fixed other hyperparameters, for an partially-derandomised SHEL network trained on MNIST.



Figure 6: Changes in complexity measure and generalisation error versus width under fixed other hyperparameters, for a partially-derandomised SHEL network trained on MNIST.

Variable Hyperparameter	Max SE	Median SE	Mean SE
Learning Rate	1.0	0.60	0.49
Width	1.0	0.40	0.46
Train Size	0.0	0.0	0.0
All	1.0	0.20	0.31

Table 2: Statistics of the sign error, SE, under different varying hyperparameters for a partially-deranomised SHEL network trained on MNIST.

**Theorem 8.** Fix prior parameters  $v_0 \in \mathbb{R}^K$  and  $U_0 \in \mathbb{R}^{K \times d}$ , margin  $\gamma > 0$  and  $\delta \in (0, 1)$ . With probability  $\geq 1 - \delta$  over  $S \sim \mathcal{D}^m$ ,

$$L(F) \leq \hat{L}_{\gamma}(F) + \tilde{O}\left(\sqrt{\frac{\|\boldsymbol{v}\|_{1}}{m\gamma^{2}}}\left(\sum_{k} |v_{k}| \|\boldsymbol{u}_{k} - \boldsymbol{u}_{k}^{0}\|_{2}^{2}\right)\right)$$

with any "binary" SHEL network specified as in Equation (3). A full (tighter) expression with constants is given in the proof.

The proof is similar to that of Theorem 5 but uses non-uniform mixture weights. If these mixture weights are given by  $p \in \Delta^K$  and their means by  $u_1, \ldots, u_K$ , the aggregate is

$$F(x) = \mathbb{E}_{i \sim \operatorname{Categ}(p), w \sim \mathcal{N}(u_i, I)} \operatorname{sign}(w \cdot x)$$
(8)

$$=\sum_{k=1}^{K} p_k \operatorname{erf}(u_k \cdot x/\sqrt{2} ||x||_2)$$
(9)

which is itself a one-hidden-layer neural network. We will also use the following lemma:

**Lemma 8.** For Gaussian mixture models with K components, with weights  $\boldsymbol{p}, \boldsymbol{p}^0 \in \Delta^K$ , and mixtures  $\mathcal{N}(u_k, I)$ ,  $\mathcal{N}(u_k^0, I)$  respectively,

$$\mathrm{KL} \leq \mathrm{KL}\left(\boldsymbol{p}, \boldsymbol{p}^{0}\right) + \frac{1}{2} \sum_{k=1}^{K} p_{k} \|\boldsymbol{u}_{k} - \boldsymbol{u}_{k}^{0}\|_{2}^{2}.$$

*Proof.* This can be proved using the chain rule for KL as in the proof of Theorem 5. A more elementary method uses the log-sum inequality:  $a \log(a/b) \leq \sum_i a_i \log(a_i/b_i)$  with  $a := \sum_i a_i, b := \sum_i b_i$ . Let  $q_k, q_k^0$  be the densities of the mixtures with respect to base measure  $\lambda$ ; then

$$\begin{split} \mathrm{KL} &= \int \left(\sum_{k} p_{k} q_{k}\right) \log \left(\frac{\sum_{k} p_{k} q_{k}}{\sum_{k} p_{k}^{0} q_{k}^{0}}\right) d\lambda \\ &\leq \int \sum_{k} \left(p_{k} q_{k} \log \left(\frac{p_{k} q_{k}}{p_{k}^{0} q_{k}^{0}}\right)\right) d\lambda \\ &= \sum_{k} p_{k} \log \frac{p_{k}}{p_{k}^{0}} + \sum_{k} p_{k} \int q_{k} \log \frac{q_{k}}{q_{k}^{0}} d\lambda \\ &= \mathrm{KL} \left(\boldsymbol{p}, \boldsymbol{p}^{0}\right) + \frac{1}{2} \sum_{k=1}^{K} p_{k} \|\boldsymbol{u}_{k} - \boldsymbol{u}_{k}^{0}\|_{2}^{2}. \end{split}$$

Proof of Theorem 8. Define P as a distribution on functions  $f(x) = \operatorname{sign}(w \cdot x)$  defined by the following procedure. Choose a mixture index  $k \in [2K]$  with probability  $p_k = \max\{0, v_k / \|v\|_1\}$ 

for  $k \leq K$ , or probability  $p_k = \max\{0, -v_k/\|\boldsymbol{v}\|_1\}$  for k > K respectively (this is just the standard dimension doubling to allow negative weights). For  $k \leq K$  we then draw  $\boldsymbol{w} \sim \mathcal{N}(\boldsymbol{u}_k, I)$ , and for k > K from  $\boldsymbol{w} \sim \mathcal{N}(-\boldsymbol{u}_k, I)$ .

For some T, define  $P^T$  to be the distribution on functions given by  $f(\boldsymbol{x}) = \frac{1}{T} \sum_{i=1}^{T} \operatorname{sign}(\boldsymbol{w}_i \cdot \boldsymbol{x})$  where each  $\boldsymbol{w}_i, i \in [N]$ , is sampled i.i.d. from P. Since  $f(\boldsymbol{x})$  is a average of T i.i.d. bounded variables, it is (1/T)-sub-Gaussian on  $\mathcal{X}$  with mean  $\tilde{F}(\boldsymbol{x}) = F(\boldsymbol{x})/||\boldsymbol{v}||_1 = \mathbb{E}_P[f(\boldsymbol{x})]$  (since flipping the sign of  $\boldsymbol{u}_k$  flips the sign function).

To replace F by the original SHEL network, F, we note that for any margins and data distribution (including the empirical one),  $L_{\epsilon}(\tilde{F}) = L_{\parallel \boldsymbol{v} \parallel_{1} \epsilon}(F) = L_{\gamma}(F)$  where  $\epsilon = \gamma/\|\boldsymbol{v}\|_{1}$ . From Lemmas 1 and 2

$$L(F) = L(\tilde{F}) \le \mathbb{E}_{P^T} L_{\epsilon/2}(f) + e^{-T\epsilon^2/8}$$
$$\mathbb{E}_{P^T} \hat{L}_{\epsilon/2}(f) \le \hat{L}_{\gamma}(F) + e^{-T\epsilon^2/8}.$$

We combine this with the PAC-Bayes bound for  $P^T$  at the  $\epsilon/2$  margin loss to find

$$\operatorname{kl}(\hat{L}_{\gamma}(\tilde{F}) + e^{-T\epsilon^{2}/8} : L(\tilde{F}) - e^{-T\epsilon^{2}/8}) \leq \frac{\log(1/\delta) + \operatorname{KL}\left(P^{T}, P_{0}^{T}\right)}{m}$$

where  $P_0^T$  is a PAC-Bayesian prior.

We set this prior  $P_0$  as a uniform mixture model over 2K components of the form  $\mathcal{N}(u_k^0, I)$ and  $\mathcal{N}(-u_k^0, I)$  for  $k \leq K$  and k > K respectively. The PAC-Bayesian prior,  $P_0^T$ , is then defined by T independent copies of this distribution as in the definition of  $P^T$ . Therefore, by independence,  $\mathrm{KL}\left(P^T, P_0^T\right) = T \mathrm{KL}\left(P, P_0\right)$  and by Lemma 8

KL 
$$(P, P_0) \le \log 2K - H[\mathbf{p}] + \frac{1}{2} \sum_{k=1}^{K} \frac{|v_k|}{\|\mathbf{v}\|_1} \|\mathbf{u}_k - \mathbf{u}_k^0\|_2^2.$$

Set  $T = \lceil 8 \log(m) \epsilon^{-2} \rceil$  and substitute to find

$$kl(\hat{L}_{\gamma}(F) + m^{-1} : L(F) - m^{-1}) \leq \frac{8\epsilon^{2}\log m + 1}{m} KL(P, P_{0}) + \frac{\log \frac{1}{\delta}}{m}.$$
 (10)

The above expression is valid only for fixed  $\epsilon$  (which appeared in the choice of T and of the loss function used in the PAC-Bayes bound); next we cover all possible values. Consider Equation (10) for  $\epsilon_i = 2^{-i}$  with i = 0, 1, ... and  $\delta_i = \delta/(i+1)^2$ . Taking a union bound, with probability at least  $1 - \pi^2 \delta/6 \ge 1 - 2\delta$  that for every i

$$kl(\hat{L}_{\gamma}(F) + m^{-1} : L(F) - m^{-1}) \leq \frac{8(\epsilon_i)^2 \log m + 1}{m} KL(P, P_0) + \frac{\log \frac{1}{\delta}}{m}$$
(11)

For a given  $\epsilon_{\star}$  the theorem is vacuously true if  $\epsilon > 1$  (since the margin will be larger than the range of the predictor). For  $\epsilon \leq 1$  choose the smallest *i* such that  $\epsilon_i \leq \epsilon_{\star}$ , so that  $i \leq 1 + \log_2(1/\epsilon)$ . The cover is completed by bounding  $1/\epsilon_i \leq 2/\epsilon_{\star}$  and  $\log(1/\delta_i) \leq \log(1/\delta) + 2\log(\log_2(4/\epsilon_{\star}))$ .

$$\begin{aligned} \mathrm{kl}(\hat{L}_{\gamma}(F) + m^{-1} : L(F) - m^{-1}) \\ &\leq \frac{32(\|\boldsymbol{v}\|_{1}/\gamma)^{2}\log m + 1}{m} \left( \log 2K - H[\boldsymbol{p}] + \frac{1}{2} \sum_{k=1}^{K} \frac{|\boldsymbol{v}_{k}|}{\|\boldsymbol{v}\|_{1}} \|\boldsymbol{u}_{k} - \boldsymbol{u}_{k}^{0}\|_{2}^{2} \right) \\ &+ \frac{\log \frac{2}{\delta} + 2\log(\log_{2}(4\|\boldsymbol{v}\|_{1}/\gamma))}{m} \end{aligned}$$
(12)

We give the simplified form in the theorem statement using the bound  $2(p-q)^2 \leq kl(q,p)$ .