**Structural error**: This is error that arises because there is no hypothesis  $h \in \mathcal{H}$  that will perform well on the data, for example because the data was really generated by a sin wave but we are trying to fit it with a line. Estimation error: This is error that arises because we do not have enough data (or the data are in some way unhelpful) to allow us to choose a good  $h \in \mathcal{H}$ .