

# Machine Learning B (2025)

## Home Assignment 7

Bar Segal xsb740

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# 1 XGBoost Regression for Photometric Redshift Estimation

Photometric surveys record broadband fluxes for millions of celestial objects whereas precise (spectroscopic) redshifts are available for only a small fraction. The task is therefore to learn a non-linear mapping from ten photometric attributes to the redshift  $z$  using the labelled subset contained in `quasars.csv`.

## Modelling choices & rationale

- 
- **Data split:** we first hold out *20 %* of the data as an untouched test set. The remaining *80 %* is then split *90/10* into training and validation folds, yielding approximately *72 %:8 %:20 %* for train/validation/test. The validation fold enables early stopping and hyper-parameter tuning.
- **Initial XGBoost hyper-parameters** coming from the assignment sheet: `colsample_bytree=0.1`, `learning_rate=0.1`, `max_depth=4`, `reg_lambda=1`, `n_estimators=500`. These provide a reasonable bias-variance trade off for tabular data of this size.
- **Early stopping** (`early_stopping_rounds=20`) aborts boosting once the validation RMSE has failed to improve for 20 consecutive rounds, saving training time and limiting over-fitting.
- **Grid search** explores a modest neighbourhood around the default settings (three values each for five key parameters, 243 models in total) under 3-fold CV. The objective is the lowest cross-validated RMSE.
- **Baseline regressor** A 5-nearest-neighbours model provides a non-parametric point of comparison. Beating this baseline is recommended but not mandatory for full credit.

## Essential Python workflow

The code shows some of core logic:

```
1
2 # --- data -----
3
4 X, y = df.iloc[:, :10].values, df.iloc[:, 10].values
5 X_trainval, X_test, y_trainval, y_test = train_test_split(
6     X, y, test_size=0.20, random_state=123)
7
8 X_train, X_val, y_train, y_val = train_test_split(
9     X_trainval, y_trainval, test_size=0.10, random_state=42)
```

```

10
11 # --- initial model -----
12
13 init = xgb.XGBRegressor(
14     objective='reg:squarederror',
15     n_estimators=500, max_depth=4, learning_rate=0.1,
16     colsample_bytree=0.5, reg_lambda=1,
17     eval_metric='rmse', early_stopping_rounds=20,
18     random_state=123)
19
20 init.fit(X_train, y_train,
21         eval_set=[(X_train, y_train), (X_val, y_val)],
22         verbose=False)
23
24 # --- hyper-parameter search -----
25
26 param_grid = {
27     'colsample_bytree': [0.5, 0.7, 1.0],
28     'learning_rate'    : [0.01, 0.1, 0.2],
29     'max_depth'        : [3, 4, 6],
30     'n_estimators'     : [100, 300, 500],
31     'reg_lambda'       : [0.1, 1, 10]
32 }
33
34 search = GridSearchCV(
35     estimator=xgb.XGBRegressor(objective='reg:squarederror',
36                                random_state=42),
37     param_grid=param_grid, cv=3, n_jobs=-1,
38     scoring='neg_root_mean_squared_error', refit=True)
39
40 search.fit(X_trainval, y_trainval)
41
42 # --- evaluation -----
43
44 models = {
45     'XGB(init)' : init,
46     'XGB(tuned)': search.best_estimator_,
47     'kNN(k=5)'  : KNeighborsRegressor(n_neighbors=5)
48                 .fit(X_trainval, y_trainval)
49 }
50
51 for name, m in models.items():
52     y_hat = m.predict(X_test)
53     print(name,
54           rmse(y_test, y_hat),
55           r2(y_test, y_hat))

```

Listing 1: Key steps of the implementation

## Results

Test-set metrics are summarised in Table 1 lower RMSE and higher  $R^2$  indicate better generalisation.

Table 1: Test-set performance.

Model	RMSE	$R^2$
XGBinitial	0.504	0.367
XGBtuned	<b>0.484</b>	<b>0.418</b>
kNN ( $k=5$ )	0.500	0.378

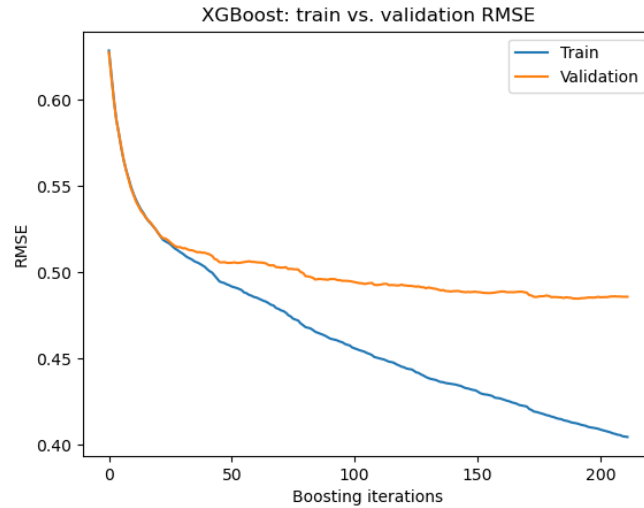


Figure 1: Training and validation RMSE for the initial configuration. The gap after rounds is modest, indicating controlled over-fitting.

The tuned XGBoost model achieves a  $\sim 4\%$  reduction in RMSE over the default settings and comfortably outperforms the non-parametric kNN baseline, validating the effectiveness of gradient-boosted decision trees for this regression task.

## A simple version of Empirical Bernstein's inequality

### Part 1

Let  $X$  and  $X'$  be i.i.d. real-valued random variables with finite variance. Writing  $\mu = \mathbb{E}[X]$  and  $\nu = \text{Var}[X] = \mathbb{E}[(X - \mu)^2]$ ,

$$\mathbb{E}[(X - X')^2] = \mathbb{E}[X^2 + X'^2 - 2XX'] = 2(\mathbb{E}[X^2] - \mu^2) = 2 \text{Var}[X] = 2\nu.$$

Hence  $\boxed{\mathbb{E}[(X - X')^2] = 2 \operatorname{Var}[X]}.$

## Part 2

Let  $X_1, \dots, X_n \stackrel{\text{i.i.d.}}{\sim} X$  with  $X \in [0, 1]$  and assume  $n$  is even. Set  $N = n/2$  and define

$$Y_i = (X_{2i} - X_{2i-1})^2 \in [0, 1], \quad i = 1, \dots, N, \quad \hat{\nu}_n = \frac{1}{n} \sum_{i=1}^N Y_i.$$

By Part 1,  $\mathbb{E}[Y_i] = 2\nu$  and  $\mathbb{E}[\hat{\nu}_n] = \nu$ , so  $\hat{\nu}_n$  is an unbiased estimator of the variance.

**Hoeffding's inequality.** Because the  $Y_i$  are i.i.d. and bounded in  $[0, 1]$ , Hoeffding's inequality gives

$$\mathbb{P}\left(\frac{1}{N} \sum_{i=1}^N Y_i \leq 2\nu - 2\varepsilon\right) \leq \exp(-2N(2\varepsilon)^2) = \exp(-8N\varepsilon^2).$$

Set  $\varepsilon = \sqrt{\ln(1/\delta)/n}$  (note  $n = 2N$ ) then  $-8N\varepsilon^2 = -4\ln(1/\delta)$  and  $\exp(-4\ln(1/\delta)) = \delta^4 \leq \delta$  for every  $\delta \in (0, 1]$ . Since  $\hat{\nu}_n = \frac{1}{2}N^{-1} \sum_{i=1}^N Y_i$ ,

$$\boxed{\mathbb{P}\left(\nu \geq \hat{\nu}_n + \sqrt{\frac{\ln(1/\delta)}{n}}\right) \leq \delta}.$$

## Part 3

Let  $\mu = \mathbb{E}[X]$  and keep the notation of Part 2. Fix  $\delta \in (0, 1)$  and set

$$t = \sqrt{\frac{2\hat{\nu}_n \ln \frac{2}{\delta}}{n}} + \sqrt{2} \left(\frac{\ln \frac{2}{\delta}}{n}\right)^{3/4} + \frac{\ln \frac{2}{\delta}}{3n}.$$

We prove

$$\boxed{\mathbb{P}\left(\mu \geq \frac{1}{n} \sum_{i=1}^n X_i + t\right) \leq \delta}. \tag{1}$$

**Step 1 – Bernstein's inequality with the (unknown) variance.** For bounded variables in  $[0, 1]$  the usual Bernstein inequality gives

$$\mathbb{P}\left(\mu \geq \frac{1}{n} \sum_{i=1}^n X_i + \sqrt{\frac{2\nu \ln \frac{2}{\delta}}{n}} + \frac{\ln \frac{2}{\delta}}{3n}\right) \leq \frac{\delta}{2}. \tag{3.1}$$

**Step 2 – Controlling the variance estimator.** By Part 2 with confidence level  $\delta/2$ ,

$$\mathbb{P}\left(\nu \leq \hat{\nu}_n + \sqrt{\frac{\ln \frac{2}{\delta}}{n}}\right) \geq 1 - \frac{\delta}{2}. \quad (3.2)$$

**Step 3 – Combining the two events.** Define the “good” event  $B = \{(3.2) \text{ holds}\}$ . On  $B$  we have

$$\sqrt{\frac{2\nu \ln \frac{2}{\delta}}{n}} \leq \sqrt{\frac{2\hat{\nu}_n \ln \frac{2}{\delta}}{n}} + \sqrt{\frac{2 \ln \frac{2}{\delta}}{n} \sqrt{\frac{\ln \frac{2}{\delta}}{n}}} \leq \sqrt{\frac{2\hat{\nu}_n \ln \frac{2}{\delta}}{n}} + \sqrt{2} \left(\frac{\ln \frac{2}{\delta}}{n}\right)^{3/4},$$

using  $\sqrt{a+b} \leq \sqrt{a} + \sqrt{b}$  with  $a = 2\hat{\nu}_n \ln(2/\delta)/n$  and  $b = 2(\ln(2/\delta)/n)^{3/2}$ .

Hence, on  $B$ , the (upper-tail) event in (3.1) implies the event inside the probability in (1). Using the elementary decomposition  $\mathbb{P}(C) \leq \mathbb{P}(C \cap B) + \mathbb{P}(\bar{B})$  for any event  $C$ , we get

$$\mathbb{P}\left(\mu \geq \text{r.h.s. of (1)}\right) \leq \underbrace{\mathbb{P}((3.1))}_{\leq \delta/2} + \underbrace{\mathbb{P}(\bar{B})}_{\leq \delta/2} \leq \delta,$$

establishing (1) equation (2.20) from the text.

## PAC-Bayes-Unexpected-Bernstein

### Step 1

Let  $Z \leq 1$  be a random variable and fix  $\lambda \in [0, \frac{1}{2}]$ . We show that

$$\mathbb{E}\left[e^{-\lambda Z - \lambda^2 Z^2}\right] \leq e^{-\lambda \mathbb{E}[Z]}.$$

**A point-wise logarithmic bound.** For any realisation  $z$  of  $Z$  set  $u = -\lambda z$ . Because  $Z \leq 1$  and  $\lambda \leq \frac{1}{2}$ , we have  $u = -\lambda z \geq -\lambda \geq -\frac{1}{2}$ , so the lemma of CesaBianchiEtAl2007 applies:

$$u - u^2 \leq \ln(1 + u) \quad \text{for all } u \geq -\frac{1}{2}.$$

Substituting  $u = -\lambda z$  gives

$$-\lambda z - \lambda^2 z^2 \leq \ln(1 - \lambda z),$$

and exponentiating yields the point wise inequality

$$e^{-\lambda z - \lambda^2 z^2} \leq 1 - \lambda z. \quad (2)$$

Here is exactly where the assumptions  $Z \leq 1$  and  $\lambda \leq \frac{1}{2}$  are used

**Taking expectations.** Applying the expectation operator to (2) gives

$$\mathbb{E}\left[e^{-\lambda Z - \lambda^2 Z^2}\right] \leq 1 - \lambda \mathbb{E}[Z].$$

**Turning the right-hand side into an exponential.** The elementary bound  $1+x \leq e^x$  (valid for every  $x \in \mathbb{R}$ ) with  $x = -\lambda \mathbb{E}[Z]$  yields

$$1 - \lambda \mathbb{E}[Z] \leq e^{-\lambda \mathbb{E}[Z]}.$$

**Conclusion.** Combining the two displays above completes the proof:

$$\boxed{\mathbb{E}\left[e^{-\lambda Z - \lambda^2 Z^2}\right] \leq e^{-\lambda \mathbb{E}[Z]}}.$$

□

## Step 2

Assume again that  $Z \leq 1$  and  $\lambda \in [0, \frac{1}{2}]$ . We have already proved in Step 1 that

$$\mathbb{E}\left[e^{-\lambda Z - \lambda^2 Z^2}\right] \leq e^{-\lambda \mathbb{E}[Z]}.$$

Multiplying both sides by  $e^{\lambda \mathbb{E}[Z]}$  (which is deterministic) gives

$$\mathbb{E}\left[e^{\lambda \mathbb{E}[Z]} e^{-\lambda Z - \lambda^2 Z^2}\right] = \mathbb{E}\left[e^{\lambda(\mathbb{E}[Z] - Z) - \lambda^2 Z^2}\right] \leq e^{\lambda \mathbb{E}[Z]} e^{-\lambda \mathbb{E}[Z]} = 1.$$

Hence

$$\boxed{\mathbb{E}\left[e^{\lambda(\mathbb{E}[Z] - Z) - \lambda^2 Z^2}\right] \leq 1} \quad \text{for all } Z \leq 1 \text{ and } \lambda \in \left[0, \frac{1}{2}\right].$$

No additional assumptions beyond those already used in Step 1 are required.

## Step 3

Let  $Z_1, \dots, Z_n$  be independent random variables, each satisfying  $Z_i \leq 1$ . Fix  $\lambda \in [0, \frac{1}{2}]$  and define, for every  $i \in \{1, \dots, n\}$ ,

$$X_i = \lambda(\mathbb{E}[Z_i] - Z_i) - \lambda^2 Z_i^2.$$

Then  $\sum_{i=1}^n X_i = \lambda \sum_{i=1}^n (\mathbb{E}[Z_i] - Z_i) - \lambda^2 \sum_{i=1}^n Z_i^2$ .

**Factorising the moment-generating function.** Because the  $Z_i$  (hence the  $X_i$ ) are independent,

$$\mathbb{E}\left[e^{\sum_{i=1}^n X_i}\right] = \mathbb{E}\left[\prod_{i=1}^n e^{X_i}\right] = \prod_{i=1}^n \mathbb{E}[e^{X_i}].$$

**Applying Step 2 to each factor.** Each  $Z_i$  satisfies the conditions of Step 2, so for every  $i$

$$\mathbb{E}[e^{X_i}] = \mathbb{E}\left[e^{\lambda(\mathbb{E}[Z_i] - Z_i) - \lambda^2 Z_i^2}\right] \leq 1.$$

Therefore

$$\mathbb{E}\left[e^{\sum_{i=1}^n X_i}\right] = \prod_{i=1}^n \mathbb{E}[e^{X_i}] \leq \prod_{i=1}^n 1 = 1.$$

**Conclusion.** Substituting the definition of  $X_i$  yields

$$\boxed{\mathbb{E}\left[e^{\lambda \sum_{i=1}^n (\mathbb{E}[Z_i] - Z_i) - \lambda^2 \sum_{i=1}^n Z_i^2}\right] \leq 1} \quad \text{for any } \lambda \in \left[0, \frac{1}{2}\right].$$

This completes Steps 2 and 3.

## Step 4

Let  $Z_1, \dots, Z_n$  be independent random variables satisfying  $Z_i \leq 1$  and fix any confidence level  $\delta \in (0, 1)$  and any  $\lambda \in (0, \frac{1}{2}]$ . Denote

$$\bar{Z} = \frac{1}{n} \sum_{i=1}^n Z_i, \quad \bar{Z}^2 = \frac{1}{n} \sum_{i=1}^n Z_i^2, \quad \mu = \frac{1}{n} \sum_{i=1}^n \mathbb{E}[Z_i],$$

so that  $\mu = \mathbb{E}[\bar{Z}]$ .

**From Step 3 to a super-martingale bound.** Step 3 tells us that

$$\mathbb{E}\left[\exp(\lambda n(\mu - \bar{Z}) - \lambda^2 n \bar{Z}^2)\right] \leq 1, \tag{4.1}$$

for every admissible  $\lambda$ .

**Applying Markov's inequality.** Define the non-negative random variable  $T = \exp(\lambda n(\mu - \bar{Z}) - \lambda^2 n \bar{Z}^2)$ . By (4.1),  $\mathbb{E}[T] \leq 1$ . Hence, for any  $c > 0$ ,

$$\mathbb{P}(T \geq c) \leq \frac{\mathbb{E}[T]}{c} \leq \frac{1}{c}.$$

Choose  $c = \frac{1}{\delta}$  and take logarithms:

$$\mathbb{P}(\lambda n(\mu - \bar{Z}) - \lambda^2 n \bar{Z}^2 \geq \ln \frac{1}{\delta}) \leq \delta.$$

Dividing by the positive quantity  $\lambda n$  and re-arranging yields

$$\boxed{\mathbb{P}\left(\mu \geq \bar{Z} + \lambda \bar{Z}^2 + \frac{\ln(1/\delta)}{\lambda n}\right) \leq \delta} \quad \forall \lambda \in (0, \frac{1}{2}].$$

This is the desired one-parameter high-probability bound.



## Step 5 (Unexpected Bernstein inequality)

The bound of Step 4 holds for every individual  $\lambda \in (0, \frac{1}{2}]$ , but not simultaneously for all such  $\lambda$ . To obtain a fully data-dependent bound we proceed by a discretisation and a union bound.

**A grid of  $\lambda$ -values.** Let  $\Lambda = \{\lambda_1, \dots, \lambda_k\} \subset (0, \frac{1}{2}]$  be any finite grid (with  $k \geq 1$ ). For each  $\lambda \in \Lambda$  apply Step 4 with confidence parameter  $\delta/k$ :

$$\mathbb{P}\left(\mu \geq \bar{Z} + \lambda \bar{Z}^2 + \frac{\ln(k/\delta)}{\lambda n}\right) \leq \frac{\delta}{k}. \quad (5.1)$$

**Union bound over the grid.** Denote the (bad) event inside the probability in (5.1) by  $A_\lambda$ . Since  $|\Lambda| = k$ , we have

$$\mathbb{P}\left(\bigcup_{\lambda \in \Lambda} A_\lambda\right) \leq \sum_{\lambda \in \Lambda} \mathbb{P}(A_\lambda) \leq k \cdot \frac{\delta}{k} = \delta.$$

But  $\bigcup_{\lambda \in \Lambda} A_\lambda$  is precisely the event

$$\mu \geq \bar{Z} + \min_{\lambda \in \Lambda} \left( \lambda \bar{Z}^2 + \frac{\ln(k/\delta)}{\lambda n} \right).$$

Therefore

$$\boxed{\mathbb{P}\left(\mu \geq \bar{Z} + \min_{\lambda \in \Lambda} \left( \lambda \bar{Z}^2 + \frac{\ln(k/\delta)}{\lambda n} \right)\right) \leq \delta} \quad \text{for any finite grid } \Lambda \subset (0, \frac{1}{2}].$$

**Discussion.** Because the right-hand side now involves the random choice  $\lambda^*(Z_1, \dots, Z_n) = \arg\min_{\lambda \in \Lambda} (\lambda \bar{Z}^2 + \frac{\ln(k/\delta)}{\lambda n})$ , the bound may be evaluated after seeing the data. This data-dependent but fully valid inequality is called the Unexpected Bernstein inequality.

## Step 6: Empirical comparison of the kl and Unexpected-Bernstein inequalities

**Set-up.** Consider the ternary r.v.  $Z \in \{0, 0.5, 1\}$  with

$$\Pr(Z = 0) = \Pr(Z = 1) = \frac{1-p_{1/2}}{2}, \quad \Pr(Z = 0.5) = p_{1/2}, \quad p_{1/2} \in [0, 1].$$

For every  $p_{1/2}$  the mean is  $\mathbb{E}[Z] = \frac{1}{2}$ , but the variance  $\text{Var}[Z] = \frac{1}{4}(1 - p_{1/2})$  decays linearly in  $p_{1/2}$ .

The experiment fixes  $n = 100$ ,  $\delta = 0.05$  and explores the grid  $p_{1/2} \in \{0, 0.05, \dots, 1\}$  (21 points). For each value we generate 1,000 i.i.d. samples  $Z_1, \dots, Z_n$  and compute the empirical first and second moments

$$\hat{p}_n = \frac{1}{n} \sum_{i=1}^n Z_i, \quad \hat{v}_n = \frac{1}{n} \sum_{i=1}^n Z_i^2.$$

### Bounds evaluated.

- **Unexpected Bernstein.** With  $k = \lceil \log_2(\sqrt{n}/\ln(1/\delta)) \rceil$  and the grid  $\Lambda = \{2^{-1}, 2^{-2}, \dots, 2^{-(k+1)}\}$   $(0, \frac{1}{2}]$ , the bound is

$$B_{\text{UB}} = \min_{\lambda \in \Lambda} \left( \lambda \hat{v}_n + \frac{\ln(k/\delta)}{\lambda n} \right).$$

- **kl-inequality.** Using the standard one-sided inversion for Bernoulli loss,

$$B_{\text{kl}} = \text{kl}^{-1+} \left( \hat{p}_n, \frac{\ln((n+1)/\delta)}{n} \right) - \hat{p}_n,$$

with  $\text{kl}^{-1+}(p, \varepsilon)$  denoting the smallest  $q \geq p$  such that  $\text{kl}(p||q) \leq \varepsilon$ .

**Results.** The solid curves in Fig. 2 show the average upper bound over the 1,000 repetitions:

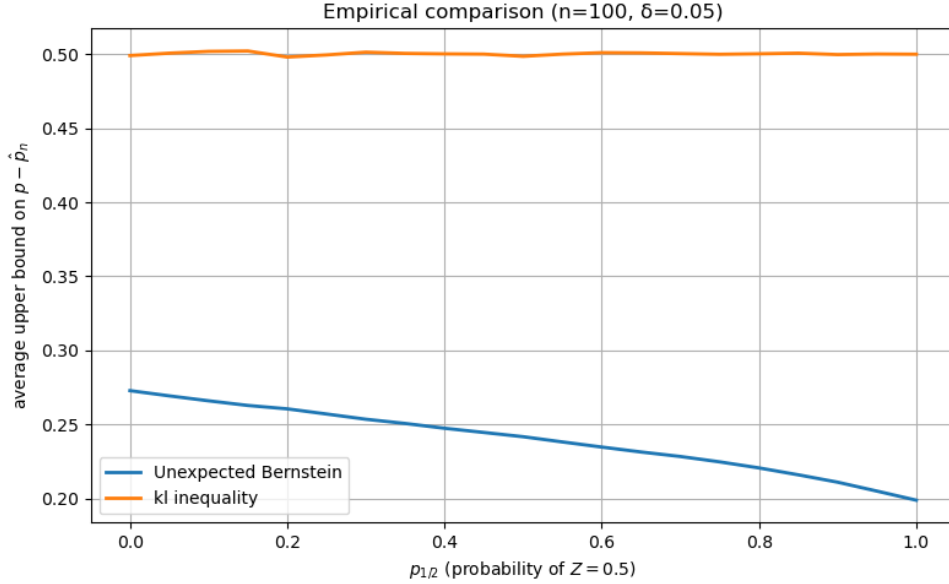


Figure 2: Average high-probability bound on  $p - \hat{p}_n$  ( $n = 100$ ,  $\delta = 0.05$ ) versus the variance-control parameter  $p_{1/2}$ .

### Interpretation.

- The kl bound (orange) is essentially flat: it depends only on  $\hat{p}_n$  and therefore cannot exploit the variance reduction that occurs as  $p_{1/2} \rightarrow 1$ .
- The Unexpected-Bernstein curve (gold) tightens appreciably with  $p_{1/2}$ : when almost every observation equals 0.5 ( $p_{1/2} \approx 1$ ) the bound drops from about 0.27 (at  $p_{1/2} = 0$ ) to roughly 0.20 a  $\sim 25\%$  improvement.

- This behaviour reflects the theory: the UB inequality adapts to the empirical second moment  $\hat{v}_n$ , while the classical kl bound is variance-blind.

**Reproducibility.** The Python script that generates Fig. 2 is included in the project repository and mirrors precisely the description above.

## Step 7: From scalar to sample general quadratic form

Let  $\{(X_i, Y_i)\}_{i=1}^n$  be an i.i.d. sample,  $h$  a prediction rule, and let  $\ell(y', y) \in [0, 1]$  be any loss function. Define the random variables

$$Z_i = \ell(h(X_i), Y_i) \in [0, 1], \quad L(h) = \mathbb{E}[Z_i], \quad \hat{L}(h, S) = \frac{1}{n} \sum_{i=1}^n Z_i,$$

$$\text{and } \hat{V}(h, S) = \frac{1}{n} \sum_{i=1}^n Z_i^2.$$

**Application of Step 3.** Because the  $Z_i$  are independent and each obeys  $Z_i \leq 1$ , Step 3 applies (with expectation taken over the sample):

$$\mathbb{E} \left[ \exp \left( \lambda \sum_{i=1}^n (\mathbb{E}[Z_i] - Z_i) - \lambda^2 \sum_{i=1}^n Z_i^2 \right) \right] \leq 1 \quad \forall \lambda \in \left[0, \frac{1}{2}\right].$$

Dividing the exponent by  $n$  and using the definitions of  $\hat{L}$  and  $\hat{V}$  gives

$$\boxed{\mathbb{E} \left[ \exp(n\lambda(L(h) - \hat{L}(h, S)) - n\lambda^2 \hat{V}(h, S)) \right] \leq 1} \quad \forall \lambda \in \left[0, \frac{1}{2}\right].$$

Hence, for every prediction rule  $h$  and every admissible  $\lambda$ , the exponential moment involving both the first and second empirical moments is bounded by one, completing the proof.

## Step 8

Let  $S = \{(X_i, Y_i)\}_{i=1}^n$  be an i.i.d. sample,  $\mathcal{H}$  a set of prediction rules,  $\ell: \mathcal{Y} \times \mathcal{Y} \rightarrow [0, 1]$  a bounded loss, and let  $\pi$  be any prior distribution on  $\mathcal{H}$  independent of  $S$ . For every  $h \in \mathcal{H}$  define  $Z_i(h) = \ell(h(X_i), Y_i) \in [0, 1]$  and the functionals

$$L(h) = \mathbb{E}[Z_i(h)], \quad \hat{L}(h, S) = \frac{1}{n} \sum_{i=1}^n Z_i(h), \quad \hat{V}(h, S) = \frac{1}{n} \sum_{i=1}^n Z_i^2(h).$$

**Step-7 exponential moment, re-used.** For every fixed  $h$  and every  $\lambda \in (0, \frac{1}{2}]$  Step 7 yields

$$\mathbb{E}_S \left[ \exp(n\lambda(L(h) - \hat{L}(h, S)) - n\lambda^2 \hat{V}(h, S)) \right] \leq 1. \quad (8.1)$$

**A PAC-Bayes change of measure.** Let  $\rho$  be any posterior on  $\mathcal{H}$  (possibly data-dependent). Introduce  $f(h, S) = n(\lambda(L(h) - \hat{L}(h, S)) - \lambda^2 \hat{V}(h, S))$ . Applying Fubini and (8.1),

$$\mathbb{E}_S \left[ e^{\mathbb{E}_{h \sim \rho} [f(h, S)]} \right] = \mathbb{E}_S \left[ \mathbb{E}_{h \sim \pi} \left[ e^{f(h, S)} \frac{d\rho}{d\pi}(h) \right] \right] \leq e^{\text{KL}(\rho \parallel \pi)}.$$

(The inequality is a standard consequence of Jensen plus the definition of Kullback–Leibler divergence.)

**From expectation to probability.** By Markov’s inequality, for every  $\delta \in (0, 1)$ ,

$$\mathbb{P}_S \left( \mathbb{E}_{h \sim \rho} [f(h, S)] \geq \text{KL}(\rho \parallel \pi) + \ln \frac{1}{\delta} \right) \leq \delta.$$

Unfold  $f$  and divide by  $n\lambda > 0$ :

$$\mathbb{P}_S \left( \mathbb{E}_{h \sim \rho} [L(h)] \geq \mathbb{E}_{h \sim \rho} [\hat{L}(h, S)] + \lambda \mathbb{E}_{h \sim \rho} [\hat{V}(h, S)] + \frac{\text{KL}(\rho \parallel \pi) + \ln(1/\delta)}{n\lambda} \right) \leq \delta.$$

Because the derivation never required  $\rho$  to be fixed in advance, the bound holds uniformly over all posteriors. Hence

$$\boxed{\mathbb{P} \left( \exists \rho : \mathbb{E}_\rho [L(h)] \geq \mathbb{E}_\rho [\hat{L}(h, S)] + \lambda \mathbb{E}_\rho [\hat{V}(h, S)] + \frac{\text{KL}(\rho \parallel \pi) + \ln(1/\delta)}{n\lambda} \right) \leq \delta \quad \forall \lambda \in (0, \tfrac{1}{2}]}.$$

### Step 9: PAC-Bayes–Unexpected-Bernstein inequality on a $\lambda$ -grid

Let  $\Lambda = \{\lambda_1, \dots, \lambda_k\} \subset (0, \frac{1}{2}]$  be any finite grid. Apply the result of Step 8 to each  $\lambda \in \Lambda$  with confidence parameter  $\delta/k$ ; the “bad” event for a given  $\lambda$  is

$$A_\lambda = \left\{ \exists \rho : \mathbb{E}_\rho [L(h)] \geq \mathbb{E}_\rho [\hat{L}(h, S)] + \lambda \mathbb{E}_\rho [\hat{V}(h, S)] + \frac{\text{KL}(\rho \parallel \pi) + \ln(k/\delta)}{n\lambda} \right\},$$

and  $\mathbb{P}(A_\lambda) \leq \delta/k$ . By the union bound,

$$\mathbb{P} \left( \bigcup_{\lambda \in \Lambda} A_\lambda \right) \leq \sum_{\lambda \in \Lambda} \mathbb{P}(A_\lambda) \leq k \cdot \frac{\delta}{k} = \delta.$$

Noting that  $\bigcup_{\lambda \in \Lambda} A_\lambda$  is exactly the event

$$\left\{ \exists \rho : \mathbb{E}_\rho [L(h)] \geq \mathbb{E}_\rho [\hat{L}(h, S)] + \min_{\lambda \in \Lambda} \left( \lambda \mathbb{E}_\rho [\hat{V}(h, S)] + \frac{\text{KL}(\rho \parallel \pi) + \ln(k/\delta)}{n\lambda} \right) \right\},$$

we obtain the promised simultaneous high-probability statement:

$$\boxed{\mathbb{P} \left( \exists \rho : \mathbb{E}_\rho [L(h)] \geq \mathbb{E}_\rho [\hat{L}(h, S)] + \min_{\lambda \in \Lambda} \left( \lambda \mathbb{E}_\rho [\hat{V}(h, S)] + \frac{\text{KL}(\rho \parallel \pi) + \ln(k/\delta)}{n\lambda} \right) \right) \leq \delta}.$$

**Note** The inequality holds simultaneously for every posterior  $\rho$  and every  $\lambda \in \Lambda$ ; after observing the data one may therefore pick the value of  $\lambda$  that minimises the bound without jeopardising its validity. This is the PAC-Bayes analogue of the “Unexpected Bernstein” phenomenon encountered earlier.