We thank reviewers R1, R2, R3 for substantial time investment, incisive feedback, and [Ba].

- **Limits.** R1 highlights ways our precision must improve. Thm2 states: {{For each d, every non-deg. local min. θ_{\star} has a nbhd U whose every member θ_0 induces, via Thm1, a T-indexed sequence of degree-d truncations $f_T \in \mathbb{R}[\eta]$ that converges as $T \to \infty$ to some $f_d \in \mathbb{R}[\eta]$.} $\mathbb{R}[\eta]$ is the free polynomial ring in dim(\mathcal{M})² many variables, topologized as euclidean space. So if $L_{d,T}(\eta)$ is Thm1's truncation, Thm2 controls $L_d(\eta) = \lim_{\tilde{T} \to \infty} L_{d,\tilde{T}}(\eta)$ but not $L_T(\eta) = \lim_{\tilde{d} \to \infty} L_{\tilde{d},T}(\eta)$, even for $d,T \gg 1$. Thm1,2's significance stems from **empirical** findings that their formal power series [**Wi**] bear on SGD practice (w.r.t. which any infinities are idealizations). Our mathematics was but a strong heuristic, so we didn't examine when L_d , L_T agree. Still: **Prop A**. {{Fix $U \subseteq \mathcal{M} \text{ open}, \theta_{\star} \in U \text{ a non-deg. local min. of } l$. Assume \$B.1 as well as global, prob.-1 bounds ($|l_x(\theta)|, ||\nabla l_x(\theta_{\star})||) < C$. If some $Q_-, Q_+ \in SPD$ bound the hessian ($Q_- < \nabla \nabla l_x(\theta) < Q_+$) on U, then $\forall d$ and for any θ_0 in some nbhd V_d of θ_{\star} : $\exists T_0, g$ with |g(T)| in $\exp(-big\Omega(T))$ so that $\sup_{T \ge T_0} |L_d(\eta) L_T(\eta) g(T)|$ (exists on some nbhd in SPSD of $\eta = 0$ and) is $o(\eta^d)$.} SP(S)D consists of symmetric positive (semi)definites.
- Sharp Minma. Like us, R3 finds Cor5² counterintutive. SGD's noise consists not of weight *displacements* but of error terms $\nabla l_x(\theta) \nabla l(x)$ in the *gradient* estimate; compare Fig5 \square to [**Ke**]'s Fig1. Say θ 's 1D with $l(\theta) = a\theta^2/2$ and training loss $\hat{l}(\theta) = l(\theta) + b\theta$. At \hat{l} 's min. $\theta = -b/a$, $l(\theta) = b^2/(2a)$. So for fixed b, sharp min.a ($a \gg 1$) overfit less (demo here). The covariance C controls b^2 , explaining Cor5's C/2H factor. Here, optimization to convergence favors sharp min.a (\star); convergence is slow at flat min.a, so flat min.a also overfit little (\diamond). (Our small- η assumption rules out the possibility that H is so sharp that SGD diverges: we treat $\eta H \ll 1$). Prior work (Pg12Par5, e.g. [**Ke**] and [**Di**]) supports both pro-flat and pro-sharp intuitions. Recognizing η 's role in translating gradients to displacements, we account for both (\star) and (\diamond) and hence unify existing intuitions (§4.3). We view it as a merit that our theory makes such counterintuitive phenomena visible.
- **ODE**. [**Ba**]'s LemA.3 specializes LemKey. In our terms, [**Ba**]'s Thm3.1 computes η^2 weight displacements using *fuzzless* diagrams (noiseless \equiv cumulants vanish \equiv fuzz-having diagrams vanish); see Tab1 for the leading corrections to [**Ba**] due to noise. Per §A.6 (say E=B=1), GD displaces θ by $\Delta_{GD}^l(\eta, T) = -T + (\frac{T}{2}) + o(\eta^2)$. Now, $\frac{1}{2} = \nabla^{\mu} \frac{1}{2} + \frac$
- **NOTATION.** R3 recognizes our expectands as tensor expressions; they are often fully contracted (so scalar) and are always random variables in some \mathbb{R}^k . Per R2,R3, we'll disemploy 'Einstein notation' and cite [Cu] (+ a new §D) for tensor examples. If advised, we'll also forgo diagrams: e.g. [a][ab: c: d][bcd] for (letters name edges). R3, Pg6Thm2 defines 'non-degenerate' as ' $H \in SPD$ '.
- Organization. R2,R3 stress the paper's narrative challenge. We'll arrange the paper into 3 self-contained tracks, each pertinent to a different goal: TrkA [pgs 1-4], for casual readers, will eschew diagrams, theorems, and §1.1/§2.2's heavy notations; illustrate Taylor series via §2.1's proof; identify §3.3's terms; state Cor4 (w/ §B.1's assumptions explicit, w/ PrpA's precision); explain §4.2's curl effect. TrkB [pgs 1-4, 5-12], for seekers of physical intuition, will use TrkA to motivate (and §A.4 to illustrate) §1.1/§2's definitions; relegate §2.2/2.1's LemKey/discussion to §B; add to §2.3.1 a resummation cartoon à la Fig5,7. For space, §C'll absorb §4. TrkC [pgs 5-12, 15-45], for our theory's extenders, will include PrpA (per R1) and more explicit statements and arguments throughout.
- **REFERENCES.** [Ba] D.G.Barrett, B.Dherin. *Implicit Gradient Regularization*. ICLR 2021. [Cu] P.McCullagh. *Tensor Methods in Statistics*, §1.1-1.4,§1.8. Dover 2017. [Di] L.Dinh, R.Pascanu, S.Bengio, Y.Bengio. *Sharp Minima*

 $^{1. \} By \ clcal.mech. \ (CM) \ of \ thermal \ continua, \ ice \ cubes \ have \ energy = \infty \ [McQuarrie \ '97, \$1-1]. \ But \ CM \ gives \ real \ insight.$

^{2.} i.e.: that **overfitting** ($\triangleq l(\theta_T) - l(\theta_0)$ where θ_0 is a min. of l) has an η^2 term greatest when ηH has moderate eigenvalues.

AUTHOR_RESPONSE

Can Generalize for Deep Nets, §1,§5. ICML 2017. [**Ke**] N.S.Keskar et alia. Large-Batch Training for Deep Learning, §4. ICLR 2017. [**Wi**] H.Wilf. Generatingfunctionology, §2.1-2.3. Academic Press 1994.