

---

# Computing Nonvacuous Generalization Bounds for Deep (Stochastic) Neural Networks with Many More Parameters than Training Data

---

**Gintare Karolina Dziugaite**  
Department of Engineering  
University of Cambridge

**Daniel M. Roy**  
Department of Statistical Sciences  
University of Toronto

## Abstract

One of the defining properties of deep learning is that models are chosen to have many more parameters than available training data. In light of this capacity for overfitting, it is remarkable that simple algorithms like SGD reliably return solutions with low test error. One roadblock to explaining these phenomena in terms of implicit regularization, structural properties of the solution, and/or easiness of the data is that many learning bounds are quantitatively vacuous when applied to networks learned by SGD in this “deep learning” regime. Logically, in order to explain generalization, we need nonvacuous bounds. We return to an idea by Langford and Caruana (2001), who used PAC-Bayes bounds to compute nonvacuous numerical bounds on generalization error for *stochastic* two-layer two-hidden-unit neural networks via a sensitivity analysis. By optimizing the PAC-Bayes bound directly, we are able to extend their approach and obtain nonvacuous generalization bounds for deep stochastic neural network classifiers with millions of parameters trained on only tens of thousands of examples. We connect our findings to recent and old work on flat minima and MDL-based explanations of generalization.

## 1 INTRODUCTION

By optimizing a PAC-Bayes bound, we show that it is possible to compute nonvacuous numerical bounds on the generalization error of deep *stochastic* neural networks with millions of parameters, despite the training data sets being one or more orders of magnitude smaller than the number of parameters. To our knowledge, these are the first explicit and nonvacuous numerical bounds computed

for trained neural networks in the modern deep learning regime where the number of network parameters eclipses the number of training examples.

The bounds we compute are data dependent, incorporating millions of components optimized numerically to identify a large region in weight space with low average empirical error around the solution obtained by stochastic gradient descent (SGD). The data dependence is essential: indeed, the VC dimension of neural networks is typically bounded below by the number of parameters, and so one needs as many training data as parameters before (uniform) PAC bounds are nonvacuous, i.e., before the generalization error falls below 1. To put this in concrete terms, on MNIST, having even 72 hidden units in a fully connected first layer yields vacuous PAC bounds.

Evidently, we are operating far from the worst case: observed generalization cannot be explained in terms the regularizing effect of the size of the neural network alone. This is an old observation, and one that attracted considerable theoretical attention two decades ago: Bartlett [Bar97; Bar98] showed that, in large (sigmoidal) neural networks, when the learned weights are small in magnitude, the fat-shattering dimension is more important than the VC dimension for characterizing generalization. In particular, Bartlett established classification error bounds in terms of the empirical margin and the fat-shattering dimension, and then gave fat-shattering bounds for neural networks in terms of the *magnitudes* of the weights and the depth of the network alone. Improved norm-based bounds were obtained using Rademacher and Gaussian complexity by Bartlett and Mendelson [BM02] and Koltchinskii and Panchenko [KP02].

These norm-based bounds are the foundation of our current understanding of neural network generalization. It is widely accepted that these bounds explain observed generalization, at least “qualitatively” and/or when the weights are explicitly regularized. Indeed, recent work by Neyshabur, Tomioka, and Srebro [NTS14] puts forth

the idea that SGD performs implicit norm-based regularization. Somewhat surprisingly, when we investigated state-of-the-art Rademacher bounds for ReLU networks, the bounds were vacuous when applied to solutions obtained by SGD on real networks/datasets. We discuss the details of this analysis in Appendix D. While most theoreticians would assume these bounds were numerically loose to *some* extent, they might be surprised to learn that the bounds do not logically establish generalization on their own. It is worth highlighting that this observation does not necessarily rule out the existence of nonvacuous bounds under the same or similar hypotheses. This is an important avenue to investigate.

## 1.1 UNDERSTANDING SGD

Our investigation was instigated by recent empirical work by Zhang, Bengio, Hardt, Recht, and Vinyals [Zha+17], who show that stochastic gradient descent (SGD), applied to deep networks with millions of parameters, is:

1. able to achieve  $\approx 0$  training error on CIFAR10 and IMAGENET and still generalize (i.e., test error remains small, despite the potential for overfitting);
2. still able to achieve  $\approx 0$  training error even after the labels are *randomized*, and does so with only a small factor of additional computational time.

Taken together, these two observations demonstrate that these networks have a tremendous capacity to overfit and yet SGD does not abuse this capacity as it optimizes the surrogate loss, despite the lack of explicit regularization.

It is a major open problem to explain this phenomenon. A natural approach would be to show that, under realistic hypotheses, SGD performs implicit regularization or tends to find solutions that possess some particular structural property that we already know to be connected to generalization. However, in order to complete the logical connection, we need an associated error bound to be nonvacuous in the regime of model size / data size where we hope to explain the phenomenon.

This work establishes a potential candidate, building off ideas by Langford [Lan02] and Langford and Caruana [LC02]: On a binary class variant of MNIST, we find that SGD solutions are nearby to relatively large regions in weight space with low average empirical error. We find this structure by optimizing a PAC-Bayes bound, starting at the SGD solution, obtaining a nonvacuous generalization bound for a stochastic neural network. Across a variety of network architectures, our PAC-Bayes bounds on the test error are in the range 16–22%. These are far from nonvacuous but loose: Chernoff bounds on the test error based on held-out data are consistently around

3%. Despite the gap, theoreticians aware of the numerical performance of generalization bounds will likely be surprised that it is possible at all to obtain nonvacuous numerical bounds for models with such large capacity trained on so few training examples. While we cannot entirely explain the magnitude of generalization, we can demonstrate nontrivial generalization.

Our approach was inspired by a line of work in physics by Baldassi, Ingrosso, Lucibello, Saglietti, and Zecchina [Bal+15] and the same authors with Borgs and Chayes [Bal+16]. Based on theoretical results for discrete optimization linking computational efficiency to the existence of nonisolated solutions, the authors propose a number of new algorithms for learning discrete neural networks by explicitly driving a local search towards nonisolated solutions. On the basis of Bayesian ideas, they posit that these solutions have good generalization properties. In a recent work with Chaudhari, Choromanska, Soatto, and LeCun [Cha+17], they introduce local-entropy loss and Entropy-SGD, extending these algorithmic ideas to modern deep learning architectures with continuous parametrizations, and obtaining impressive empirical results.

In the continuous setting, nonisolated solutions correspond to “flat minima”. The existence and regularizing effects of flat minima in the empirical error surface was recognized early on by researchers, going back at work by Hinton and Camp [HC93] and Hochreiter and Schmidhuber [HS97]. Hochreiter and Schmidhuber discuss sharp versus flat minima using the language of minimum description length (MDL; [Ris83; Grü07]). In short, describing weights in sharp minima requires high precision in order to not incur nontrivial excess error, whereas flat minimum can be described with lower precision. A similar coding argument appears in [HC93].

Hochreiter and Schmidhuber propose an algorithm to find flat minima by minimizing the training error while maximizing the log volume of a connected region of the parameter space that yields similar classifiers with similarly good training error. There are very close connections—at both the level of analysis and algorithms—with the work of Chaudhari et al. [Cha+17] and close connections with the approach we take to compute nonvacuous error bounds by exploiting the local error surface. (We discuss more related work in Section 6.)

Despite the promising underpinnings, the generalization theorems given by [Cha+17] have admittedly unrealistic assumptions, and fall short of connecting local-entropy minimization to observed generalization.

The goal of this work is to identify structure in the solutions obtained by SGD that provably implies small generalization error. Computationally, it is much easier

to demonstrate that a randomized classifier will generalize, and so our results actually pertain to the generalization error of a *stochastic* neural network, i.e., one whose weights/biases are drawn at random from some distribution on every forward evaluation of the network. Under bounded loss, Fubini’s theorem implies that we also obtain a bound on the expected error of a neural network whose weights have been randomly perturbed. It would be interesting to achieve tighter control on the distribution of error or on the error of the mean neural network.

Returning to the goal of explaining SGD and generalization in deep learning more generally, one could study whether the type of structure we exploit to obtain bounds necessarily arises from performing SGD under natural conditions. (We suspect one condition may be that the Bayes error rate is close to zero.) More ambitiously, perhaps the existence of the same structure can explain the success of SGD in practice.

## 1.2 APPROACH

Our working hypothesis is that SGD finds good solutions only if they are surrounded by a relatively large volume of solutions that are nearly as good. This hypothesis suggests that PAC-Bayes bounds may be fruitful: if SGD finds a solution contained in a large volume of equally good solutions, then the expected error rate of a classifier drawn at random from this volume should match that of the SGD solution. The PAC-Bayes theorem [McA99] bounds the expected error rate of a classifier chosen from a distribution  $Q$  in terms of the Kullback–Liebler divergence from some a priori fixed distribution  $P$ , and so if the volume of equally good solutions is large, and not too far from the mass of  $P$ , we will obtain a nonvacuous bound.

Our approach will be to use optimization to find a broad distribution  $Q$  over neural network parameters that minimizes the PAC-Bayes bound, in effect mapping out the volume of equally good solutions surrounding the SGD solution. This idea is actually a modern take on an old idea by Langford and Caruana [LC02], who apply PAC-Bayes bounds to small two-layer stochastic neural networks (with only 2 hidden units) that were trained on (relatively large, in comparison) data sets of several hundred labeled examples.

The basic idea can be traced back even further to work by Hinton and Camp [HC93], who propose an algorithm for controlling overfitting in neural networks via the minimum description length principle. In particular, they minimize the sum of the empirical squared error and the KL divergence between a prior and posterior distribution on the weights. Their algorithm is applied to networks with 100’s of inputs and 4 hidden units, trained on sev-

eral hundred labeled examples. Hinton and Camp do not compute numerical generalization bounds to verify that MDL principles alone suffice to *explain* the observed generalization.

Our algorithm more directly extends the work by Langford and Caruana, who propose to construct a distribution  $Q$  over neural networks by performing a sensitivity analysis on each parameter after training, searching for the largest deviation that does not increase the training error by more than, e.g., 1%. For  $Q$ , Langford and Caruana choose a multivariate normal distribution over the network parameters, centered at the parameters of the trained neural network. The covariance matrix is diagonal, with the variance of each parameter chosen to be the estimated sensitivity, scaled by a global constant. (The global scale is chosen so that the training error of  $Q$  is within, e.g., 1% of that of the original trained network.) Their prior  $P$  is also a multivariate normal, but with zero mean and covariance given by some scalar multiple of the identity matrix. By employing a union bound, they allow themselves to choose the scalar multiple in a data-dependent fashion to optimize the PAC-Bayes bound.

The algorithm sketched by Langford and Caruana does not scale to modern neural networks for several reasons, but one dominates: in massively overparametrized networks, individual parameters often have negligible effect on the training classification error, and so it is not possible to estimate the *relative* sensitivity of large populations of neurons by studying the sensitivity of neurons in isolation.

Instead, we use stochastic gradient descent to directly optimize the PAC-Bayes bound on the error rate of a stochastic neural network. At each step, we update the network weights and their variances by taking a step along an unbiased estimate of the gradient of (an upper bound on) the PAC-Bayes bound. In effect, the objective function is the sum of i) the empirical surrogate loss averaged over a random perturbation of the SGD solution, and ii) a generalization error bound that acts like a regularizer.

Having demonstrated that this simple approach can construct a witness to generalization, it is worthwhile asking whether these ideas can be extended to the setting of local-entropic loss [Cha+17]. If we view the distribution that defines the local-entropic loss as defining a stochastic neural network, can we use PAC-Bayes bounds to establish nonvacuous bounds on its generalization error?

## 2 PRELIMINARIES

Much of our setup is identical to that of [LC02]: We are working in the batch supervised learning setting. Data points are elements  $x \in \mathcal{X} \subseteq \mathbb{R}^k$  with binary class labels

$y \in \{-1, 1\}$ . Let  $S_m$  denote a training set of size  $m$ ,

$$S_m = \{(x_i, y_i)\}_{i=1, \dots, m}, \text{ where } (x_i, y_i) \in (\mathcal{X} \times \mathcal{Y}).$$

Let  $\mathcal{M}$  denote the set of all probability measures on the data space  $\mathbb{R}^k \times \{-1, 1\}$ . We will assume that the training examples are i.i.d. samples from some  $\mu \in \mathcal{M}$ .

A parametric family of classifiers is a function  $H : \mathbb{R}^d \times \mathbb{R}^k \rightarrow \{-1, 1\}$ , where  $h_w := H(w, \cdot) : \mathbb{R}^k \rightarrow \{-1, 1\}$  is the classifier indexed by the parameter  $w \in \mathbb{R}^d$ . The hypotheses space induced by  $H$  is  $\mathcal{H} = \{h_w : w \in \mathbb{R}^d\}$ . A randomized classifier is a distribution  $Q$  on  $\mathbb{R}^d$ . Informally, we will speak of distributions on  $\mathcal{H}$  when we mean distributions on the underlying parametrization.

We are interested in the 0–1 loss  $\ell : \mathbb{R} \times \{-1, 1\} \rightarrow \{0, 1\}$

$$\ell(\hat{y}, y) = \mathbb{I}(\text{sign}(\hat{y}) = y).$$

We will also make use of the logistic loss  $\check{\ell} : \mathbb{R} \times \{-1, 1\} \rightarrow \mathbb{R}_+$

$$\check{\ell}(\hat{y}, y) = \frac{1}{\log(2)} \log(1 + \exp(-\hat{y}y)),$$

which will serve as a convex surrogate (i.e., upper bound) to the 0–1 loss.

We define the following notions of error:

- $\hat{e}(h, S_m) = \frac{1}{m} \sum_{i=1}^m \ell(h(x_i), y_i)$  empirical classification error of hypothesis  $h$  for sample  $S_m$ ;
- $\check{e}(h, S_m) = \frac{1}{m} \sum_{i=1}^m \check{\ell}(h(x_i), y_i)$  empirical (surrogate) error of a hypothesis  $h$  on the training data set  $S_m$ . We will use this for training purposes when we need our empirical loss to be differentiable;
- $e_\mu(h) = \mathbb{E}_{S_m \sim \mu^m} [\hat{e}(h, S_m)]$  expected error for hypothesis  $h$  under the data distribution  $\mu$  (we will often drop the subscript  $\mu$  and just write  $e(h)$ );
- $\hat{e}(Q, S_m) = \mathbb{E}_{w \sim Q} [\hat{e}(h_w, S_m)]$  expected empirical error under the randomized classifier  $Q$  on  $\mathcal{H}$ ;
- $e(Q) = \mathbb{E}_{w \sim Q} [e_\mu(h_w)]$  expected error for  $Q$  on  $\mathcal{H}$ .

## 2.1 KL DIVERGENCE

Let  $Q, P$  be probability measures defined on a common measurable space  $\mathcal{H}$ , such that  $Q$  is absolutely continuous with respect to  $P$ , and write  $\frac{dQ}{dP} : \mathcal{H} \rightarrow \mathbb{R}_+ \cup \{\infty\}$  for some Radon–Nikodym derivative of  $Q$  with respect to

$P$ . Then the Kullback–Liebler divergence (or relative entropy) of  $P$  from  $Q$  is defined to be

$$\text{KL}(Q||P) := \int \log \frac{dQ}{dP} dQ.$$

We will mostly be concerned with KL divergences where  $Q$  and  $P$  are probability measures on Euclidean space,  $\mathbb{R}^d$ , absolutely continuous with respect to Lebesgue measure. Let  $q$  and  $p$  denote the respective densities. In this case, the definition of the KL divergence simplifies to

$$\text{KL}(Q||P) = \int \log \frac{q(x)}{p(x)} q(x) dx.$$

Of particular interest to us is the KL divergence between multivariate normal distributions in  $\mathbb{R}^d$ . Let  $N_q = \mathcal{N}(\mu_q, \Sigma_q)$  be a multivariate normal with mean  $\mu_q$  and covariance matrix  $\Sigma_q$ , let  $N_p = \mathcal{N}(\mu_p, \Sigma_p)$ , and assume  $\Sigma_q$  and  $\Sigma_p$  are positive definite. Then  $\text{KL}(N_q||N_p)$  is

$$\begin{aligned} & \frac{1}{2} \left( \text{tr}(\Sigma_p^{-1} \Sigma_q) - k + (\mu_p - \mu_q)^\top \Sigma_p^{-1} (\mu_p - \mu_q) \right. \\ & \left. + \ln \left( \frac{\det \Sigma_p}{\det \Sigma_q} \right) \right). \end{aligned} \quad (1)$$

For  $p, q \in [0, 1]$ , we will abuse notation and define

$$\begin{aligned} \text{KL}(q||p) & := \text{KL}(\mathcal{B}(q)||\mathcal{B}(p)) \\ & = q \log \frac{q}{p} + (1 - q) \log \frac{1 - q}{1 - p}, \end{aligned}$$

where  $\mathcal{B}(p)$  denotes the Bernoulli distribution on  $\{0, 1\}$  with mean  $p$ .

## 2.2 INVERTING KL BOUNDS

In the following sections, we will encounter bounds on a quantity  $p^* \in [0, 1]$  of the form

$$\text{KL}(q||p^*) \leq c$$

for some  $q \in [0, 1]$  and  $c \geq 0$ . Thus, we are interested in

$$\text{KL}^{-1}(q|c) := \sup \{p \in [0, 1] : \text{KL}(q||p) \leq c\}.$$

We are not aware of a simple formula for  $\text{KL}^{-1}(q|c)$ , although numerical approximations are readily obtained via Newton’s method (Appendix A). For the purpose of gradient-based optimization, we can use the well-known inequality,  $2(q - p)^2 \leq \text{KL}(q||p)$ , to obtain a simple upper bound

$$\text{KL}^{-1}(q|c) \leq q + \sqrt{c/2}. \quad (2)$$

This bound is quantitatively loose near  $q \approx 0$ , because then  $\text{KL}^{-1}(q|c) \approx c$  for  $c \ll 1$ , versus the upper bound of  $\Theta(\sqrt{c})$ . On the other hand, when  $c$  is large enough that  $q + \sqrt{c/2} > 1$ , the derivative of  $\text{KL}^{-1}(q|c)$  is zero, whereas the upper bound provides a useful derivative.

## 2.3 BOUNDS

We will employ three probabilistic bounds to control generalization error: the union bound, a sample convergence bound derived from the Chernoff bound, and the PAC-Bayes bound due to McAllester [McA99]. We state the union bound for completeness.

**Theorem 2.1 (union).** *Let  $E_1, E_2, \dots$  be events. Then  $\mathbb{P}(\bigcup_n E_n) \leq \sum_n \mathbb{P}(E_n)$ .*

Recall that  $\mathcal{B}(p)$  denotes the Bernoulli distribution on  $\{0, 1\}$  with mean  $p \in [0, 1]$ . The following bound is derived from the KL formulation of the Chernoff bound:

**Theorem 2.2 (sample convergence [LC02]).** *For every  $p, \delta \in (0, 1)$  and  $n \in \mathbb{N}$ , with probability at least  $1 - \delta$  over  $x \sim \mathcal{B}(p)^n$ ,  $\text{KL}(n^{-1} \sum_{i=1}^n x_i \| p) \leq \frac{\log \frac{2}{\delta}}{n}$ .*

Finally, we present a variant of McAllester’s PAC-Bayes bound due to Langford and Seeger [LS01]. (See also [Lan02].)

**Theorem 2.3 (PAC-Bayes [McA99; LS01]).** *For every  $\delta > 0$ ,  $m \in \mathbb{N}$ , distribution  $\mu$  on  $\mathbb{R}^k \times \{-1, 1\}$ , and distribution  $P$  on  $\mathcal{H}$ , with probability at least  $1 - \delta$  over  $S_m \sim \mu^m$ , for all distributions  $Q$  on  $\mathcal{H}$ ,*

$$\text{KL}(\hat{e}(Q, S_m) \| e(Q)) \leq \frac{\text{KL}(Q \| P) + \log \frac{m}{\delta}}{m - 1}.$$

The PAC-Bayes bound leads to the following learning algorithm [McA99]:

1. Fix a probability  $\delta > 0$  and a distribution  $P$  on  $\mathcal{H}$ .
2. Collect an i.i.d. dataset  $S_m$  of size  $m$ .
3. Compute the optimal distribution  $Q$  on  $\mathcal{H}$  that minimizes the error bound

$$\text{KL}^{-1} \left( \hat{e}(Q, S_m) \left| \frac{\text{KL}(Q \| P) + \log \frac{m}{\delta}}{m - 1} \right. \right). \quad (3)$$

4. Return the randomized classifier given by  $Q$ .

In all but the simplest scenarios, making predictions according to the optimal  $Q$  is intractable. However, we can attempt to approximate it.

## 3 PAC-BAYES BOUND OPTIMIZATION

Let  $H$  be a parametric family of classifiers and write  $h_w$  for  $H(w, \cdot)$ . We will interpret  $h_w$  as a neural network with (weight/bias) parameters  $w \in \mathbb{R}^d$ , although the development below is more general.

Fix  $\delta \in (0, 1)$  and a distribution  $P$  on  $\mathbb{R}^d$ , and let  $S_m \sim \mu^m$  be  $m$  i.i.d. training examples. We aim to minimize the PAC-Bayes bound (Eq. (3)) with respect to  $Q$ .

For  $w \in \mathbb{R}^d$  and  $s \in \mathbb{R}_+^d$ , let  $\mathcal{N}_{w,s} = \mathcal{N}(w, \text{diag}(s))$  denote the multivariate normal distribution with mean  $w$  and diagonal covariance  $\text{diag}(s)$ . As our first simplifications, we replace the PAC-Bayes with the upper bound described by Eq. (2), replace the empirical loss with its convex surrogate, and restrict  $Q$  to the family of multivariate normal distributions with diagonal covariance structure, yielding the optimization problem

$$\min_{w \in \mathbb{R}^d, s \in \mathbb{R}_+^d} \check{e}(\mathcal{N}_{w,s}, S_m) + \sqrt{\frac{\text{KL}(\mathcal{N}_{w,s} \| P) + \log \frac{m}{\delta}}{2(m - 1)}}.$$

### 3.1 THE PRIOR

In order to obtain a KL divergence in closed form, we choose  $P$  to be multivariate normal. Symmetry considerations would suggest that we choose  $P = \mathcal{N}(0, \lambda I)$  for some  $\lambda > 0$ , however there is no single good choice of  $\lambda$ . (We will also see that there are good reasons not to choose a zero mean, and so we will let  $w_0$  denote the mean to be chosen a priori.)

In order to deal with the problem of choosing  $\lambda$ , we will follow Langford and Caruana [LC02] and use a union-bound argument to choose  $\lambda$  optimally from a discrete set, at the cost of a slight expansion to our generalization bound. In particular, we will take  $\lambda = c \exp\{-j/b\}$  for some  $j \in \mathbb{N}$  and fixed  $b, c \geq 0$ . (Hence,  $b$  determines a level of precision and  $c$  is an upper bound.) If the PAC-Bayes bound for each  $j \in \mathbb{N}$  is designed to hold with probability at least  $1 - \frac{6}{\pi^2 j^2}$ , then, by the union bound (Theorem 2.1), it will hold uniformly for all  $j \in \mathbb{N}$  with probability at least  $1 - \delta$ , as desired. During optimization, we will want to avoid discrete optimization, and so we will treat  $\lambda$  as if it were a continuous variable. (We will then discretize  $\lambda$  when we evaluate the PAC-Bayes bound after the fact.) Solving for  $j$ , we have  $j = b \log \frac{c}{\lambda}$ , and so we will replace  $j$  with this term during optimization. Taking into account the choice of  $P$  and the continuous approximation to the union bound, we have the following minimization problem:

$$\min_{w \in \mathbb{R}^d, s \in \mathbb{R}_+^d, \lambda \in (0, c)} \check{e}(\mathcal{N}_{w,s}, S_m) + \sqrt{\frac{1}{2} B_{\text{RE}}(w, s, \lambda; \delta)} \quad (4)$$

where  $B_{\text{RE}}(w, s, \lambda; \delta)$  is

$$\frac{\text{KL}(\mathcal{N}_{w,s} \| \mathcal{N}(w_0, \lambda I)) + 2 \log(b \log \frac{c}{\lambda}) + \log \frac{\pi^2 m}{6\delta}}{m - 1}, \quad (5)$$

and, using Eq. (1), the KL term simplifies to

$$\frac{1}{2} \left( \frac{1}{\lambda} \|s\|_1 - d + \frac{1}{\lambda} \|w - w_0\|_2^2 + d \log \lambda - 1_d \cdot \log s \right).$$

We fix  $\delta = 0.025$ ,  $b = 100$ , and  $c = 0.1$ .

### 3.2 STOCHASTIC GRADIENT DESCENT

We cannot optimize Eq. (4) directly because we cannot compute  $\check{e}(\mathcal{N}_{w,s}, S_m)$  or its gradients efficiently. We can, however, compute the gradient of the unbiased estimate  $\check{e}(h_{w+\xi\odot\sqrt{s}}, S_m)$ , where  $\xi \sim \mathcal{N}_{0,I_d}$ . We will use an i.i.d. copy of  $\xi$  at each iteration. We did not experiment using mini-batches during bound optimization.

### 3.3 FINAL PAC-BAYES BOUND

While we treat  $\lambda$  as a continuous parameter during optimization, the union bound requires that  $\lambda$  be of the form  $\lambda = c \exp\{-j/b\}$ , for some  $j \in \mathbb{N}$ . We therefore round  $\lambda$  up or down, choosing that which delivers the best bound, as computed below.

According to the PAC-Bayes and union bound, with probability  $1 - \delta$ , uniformly over all  $w \in \mathbb{R}^d$ ,  $s \in \mathbb{R}_+^d$ , and  $\lambda$  of the form  $c \exp\{-j/b\}$ , for  $j \in \mathbb{N}$ , the error rate of the randomized classifier  $Q = \mathcal{N}_{w,s}$  is bounded by

$$\text{KL}^{-1}(\hat{e}(Q, S_m) | B_{\text{RE}}(w, s, \lambda; \delta)).$$

We cannot compute this bound exactly because computing  $\hat{e}(Q, S_m)$  is intractable. However, we can obtain unbiased estimates and apply the sample convergence bound (Theorem 2.2). In particular, given  $n$  i.i.d. samples  $w_1, \dots, w_n$  from  $Q$ , we produce the Monte Carlo approximation  $\hat{Q}_n = \sum_{i=1}^n \delta_{w_i}$ , for which  $\hat{e}(\hat{Q}_n, S_m)$  is exactly computable, and obtain the bound

$$\begin{aligned} \hat{e}(Q, S_m) &\leq \overline{\hat{e}_{n,\delta'}}(Q, S_m) \\ &:= \text{KL}^{-1}(\hat{e}(\hat{Q}_n, S_m) | n^{-1} \log 2/\delta'), \end{aligned}$$

which holds with probability  $1 - \delta'$ . By another application of the union bound,

$$e(Q) \leq \text{KL}^{-1}(\overline{\hat{e}_{n,\delta'}}(Q, S_m) | B_{\text{RE}}(w, s, \lambda; \delta)), \quad (6)$$

with probability  $1 - \delta - \delta'$ . We use this bound in our reported results.

## 4 EXPERIMENTS

Starting from neural networks whose weights have been trained by SGD (with momentum) to achieve near-perfect accuracy on a binary class variant of MNIST, we then optimize a PAC-Bayes bound on the error rate of stochastic neural network whose weights are random perturbations of the weights learned by SGD. We consider several different network architectures, varying both the depth and the width of the network.

### 4.1 DATASET

We use the MNIST handwritten digits data set [LCB10] as provided in Tensorflow [TF], where the dataset is split into the training set (55000 images) and test set (10000 images). (We do not use the validation set.) Each MNIST image is black and white and 28-pixels square, resulting in a network input dimension of  $k = 784$ . MNIST is usually treated as a multiclass classification problem. In order to use standard PAC-Bayes bounds, we produce a binary classification problem by mapping numbers  $\{0, \dots, 4\}$  to label 1 and  $\{5, \dots, 9\}$  to label  $-1$ . In some experiments, we train on random labels, i.e., binary labels drawn independently and uniformly at random.

### 4.2 INITIAL NETWORK TRAINING BY SGD

All experiments are performed on multilayer perceptrons, i.e., feed-forward neural networks with 2 or more layers, each layer fully connected to the previous and next layer. We choose a standard initialization scheme for the weights and biases: Weights are initialized randomly from a normal distribution (with mean zero and standard deviation  $\sigma = 0.04$ ) that is truncated to  $[-2\sigma, 2\sigma]$ . Biases are initialized to a constant value of 0.1 for the first layer and 0 for the remaining layers. We let  $w_0$  denote this random initialization of the weights (and biases).

We use REctified Linear Unit (RELU) activations at every hidden node. The last layer is linear. In order to train the weights, we minimize the logistic loss by SGD with momentum (learning rate 0.01; momentum 0.9). SGD is run in mini-batches of size 100. These settings are similar to those in [Zha+17].

On our binary class variant of MNIST, we train several neural network architectures of varying depth and width (see Table 1). In each case, we train for a total of 20 epochs. We also train a small network (with one 600-unit hidden layer) on *random* labels, in order to demonstrate the large capacity of the network. Obtaining  $\approx 0$  training error requires 120 epochs. See the first two rows of Table 1 for the train/test error rates.

### 4.3 PAC-BAYES BOUND OPTIMIZATION

Starting from weights  $w$  learned by SGD, we construct a stochastic neural network with a multivariate normal distribution  $Q = \mathcal{N}_{w,s}$  over its weights with mean  $w$  and covariance  $\text{diag}(s)$ . We initialize  $s$  to  $|w|$  and  $|w|/10$  for true- and random-label experiments, respectively.

We optimize the PAC-Bayes bound (Eq. (4)) starting from an initial choice of  $e^{-6}$  for the prior variance  $\lambda$  and the prior mean fixed at the random initialization  $w_0$ . (See Appendix B for a discussion of this subtle but important inno-

Experiment	T-600	T-1200	T-300 <sup>2</sup>	T-600 <sup>2</sup>	T-1200 <sup>2</sup>	T-600 <sup>3</sup>	R-600
Train error	0.001	0.002	0.000	0.000	0.000	0.000	0.007
Test error	0.018	0.018	0.015	0.016	0.015	0.013	0.508
SNN train error	0.028	0.027	0.027	0.028	0.029	0.027	0.112
SNN test error	0.034	0.035	0.034	0.033	0.035	0.032	0.503
PAC-Bayes bound	0.161	0.179	0.170	0.186	0.223	0.201	1.352
KL divergence	5144	5977	5791	6534	8558	7861	201131
# parameters	471k	943k	326k	832k	2384k	1193k	472k
VC dimension	26m	56m	26m	66m	187m	121m	26m

Table 1: Results for experiments on binary class variant of MNIST. SGD is either trained on (T) true labels or (R) random labels. The network architecture is expressed as  $N^L$ , indicating  $L$  hidden layers with  $N$  nodes each. Errors are classification error. The reported VC dimension is the best known upper bound (in millions) for ReLU networks. The SNN error rates are tight upper bounds (see text for details). The PAC-Bayes bounds upper bound the test error with probability 0.965.

variation.) We transform the constrained optimization over  $w \in \mathbb{R}^d$ ,  $s \in \mathbb{R}_+^d$ , and  $\lambda \in (0, c)$ , into an unconstrained optimization over  $w$ ,  $\frac{1}{2} \log(s)$ , and  $\frac{1}{2} \log(\lambda)$ , respectively.

We optimize the objective by gradient descent with the RMSprop optimizer (with decay 0.9, as is typical). We use the unbiased estimate of the gradient of the empirical surrogate error of the randomized classifier  $Q = \mathcal{N}_{w,s}$ . We set the learning rate to 0.001 for the first 150000 iterations, and then lower it to 0.0001 for the final 50000 iterations. For the random-label experiment, we optimize the bound with a smaller 0.0001 learning rate for 500000 iterations. In both cases, the learning rate is tuned so that the objective decreases smoothly during learning.

Algorithm 1 is pseudo code for optimizing the PAC-Bayes bound. The code implements vanilla SGD, although it can be easily modified to use an optimizer like RMSprop.

#### 4.4 REPORTED VALUES

Reported error rates correspond to classification error. Train and test error rates are empirical averages for networks learned by SGD. In light of 10000 test data points and the observed error rates, upper bounds via Theorem 2.2 are only 0.005 higher.

Reported train and test error rates for the stochastic neural networks (abbreviated SNN) are upper bounds computed by an application of Theorem 2.2 as described in Section 3.3 with  $\delta' = 0.01$  and  $n = 150000$ . These numbers produce estimates within 0.001–0.002.

The PAC-Bayes bound is computed as described in Section 3.3. Each bound holds with probability 0.965 over the choice of the training set and the draws from the learned SNN  $Q$ . For the random-label experiment, we report  $\sqrt{\frac{1}{2} B_{\text{RE}}(w, s, \lambda; \delta)}$  from Eq. (5), since the PAC-Bayes

bound is vacuous when this quantity is greater than 1.

Our VC-dimension bounds for ReLU networks are computed from a formula communicated to us by Bartlett [Bar17]. These bounds are in  $O(LW \log W)$ , where  $L$  is the number of layers and  $W$  is the total number of tunable parameters across layers.

## 5 RESULTS

See Table 1. All SGD trained networks achieve perfect or near-perfect accuracy on the training data. On true labels, the SNN mean training error increases slightly as the weight distribution broadens to minimize the KL divergence. The SGD solution is close to mean of the SNN as measured with respect to the SNN covariance. (See Appendix C for a discussion.) For the random-label experiment, the SNN mean training error rises above 10%. Ideally, it might have risen to nearly 50%, while driving down the KL term to near zero.

The empirical test error of the SGD classifiers does not change much across the different architectures, despite the potential for overfitting. This phenomenon is well known, though still remarkable. For the random-label experiment, the empirical test classification error of 0.508 represents lack of generalization, as expected. The same two patterns hold for the SNN test error too, with slightly higher error rates.

Remarkably, the PAC-Bayes bounds do not grow much despite the networks becoming several times larger, and all true label experiments have classification error bounded by 0.23. (This observation is consistent with [NTS14].) Since larger networks possess many more symmetries, the true PAC-Bayes bounds for our learned stochastic neural network classifier might be substantially smaller. (See Appendix B for a discussion.) While these bounds

---

**Algorithm 1** PAC-Bayes bound optimization by SGD

---

**Input:**

- $w_0 \in \mathbb{R}^d$        $\triangleright$  Network parameters (random init.)
- $w \in \mathbb{R}^d$        $\triangleright$  Network parameters (SGD solution)
- $S_m$                $\triangleright$  Training examples
- $\delta \in (0, 1)$        $\triangleright$  Confidence parameter
- $b \in \mathbb{N}, c \in (0, 1)$        $\triangleright$  Precision and bound for  $\lambda$
- $\tau \in (0, 1), T$        $\triangleright$  Learning rate; # of iterations

**Output:** Optimal  $w, s, \lambda$        $\triangleright$  Weights, variances

- 1: **procedure** PAC-BAYES-SGD
  - 2:     $\varsigma \leftarrow \text{abs}(w)$        $\triangleright$  where  $s(\varsigma) = e^{2\varsigma}$
  - 3:     $\varrho \leftarrow -3$        $\triangleright$  where  $\lambda(\varrho) = e^{2\varrho}$
  - 4:     $B(w, s, \lambda, w') = \check{e}(h_{w'}, S_m) + \sqrt{\frac{1}{2} B_{\text{RE}}(w, s, \lambda)}$
  - 5:    **for**  $t \leftarrow 1, T$  **do**       $\triangleright$  Run SGD for T iterations.
  - 6:     Sample  $\xi \sim \mathcal{N}(0, I_d)$
  - 7:      $w'(w, \varsigma) = w + \xi \odot \sqrt{s(\varsigma)}$        $\triangleright$  Gradient step
  - 8:     
$$\begin{bmatrix} w \\ \varsigma \\ \varrho \end{bmatrix} \leftarrow \tau \begin{bmatrix} \nabla_w B(w, s(\varsigma), \lambda(\varrho), w'(w, \varsigma)) \\ \nabla_\varsigma B(w, s(\varsigma), \lambda(\varrho), w'(w, \varsigma)) \\ \nabla_\varrho B(w, s(\varsigma), \lambda(\varrho), w'(w, \varsigma)) \end{bmatrix}$$
  - 9:    **return**  $w, s(\varsigma), \lambda(\varrho)$
- 

are several times larger than the test error estimated on held-out data (approximately, 0.03), they demonstrate nontrivial generalization. The PAC-Bayes bound for the random-label experiment is vacuous.

The VC-dimension upper bounds indicate that data independent bounds will be vacuous by several orders of magnitude. Because the number of parameters exceeds the available training data, lower bounds imply that generalization cannot be explained in a data independent way.

## 6 RELATED WORK

As we mention in the introduction, our approach scales the ideas in [HC93] and [LC02] to the modern deep learning regime where the networks have millions of parameters, but are trained on one or two orders of magnitude fewer training examples. The objective we optimize is an upper bound on the PAC-Bayes bound, which we know from the discussion in Section 2.2 will be very loose when the empirical classification error is approximately zero. Indeed, in that case, the PAC-Bayes bound is approximately

$$\hat{e}(\mathcal{N}_{w,s}, S_m) + \frac{\text{KL}(\mathcal{N}_{w,s} || P) + \log \frac{m}{\delta}}{(m-1)}. \quad (7)$$

The objective optimized by Hinton and Camp is of the same essential form as this one, except for the choice of squared error and different prior and posterior distributions. We explored using Eq. (7) as our objective with a surrogate loss, but it did not produce different results.

In the introduction we discuss the close connection of our work to several recent papers [Bal+15; Bal+16; Cha+17] that study “flat” or nonisolated minima on the account of their generalization and/or algorithmic properties.

Based on theoretical results for k-SAT that efficient algorithms find nonisolated solutions, Baldassi et al. [Bal+16] model efficient neural network learning algorithms as minimizers of a *replicated* version of the empirical loss surface, which emphasizes nonisolated minima and deemphasizes isolated minima. They then propose several algorithms for learning discrete neural networks using these ideas.

In follow-up work with Chaudhari, Choromanska, Soatto, and LeCun [Cha+17], they translate these ideas into the setting of continuously parametrized neural networks. They introduce an algorithm, called Entropy-SGD, which seeks out large regions of dense local minima: it maximizes the depth and flatness of the energy landscape. Their objective integrates both the energy of nearby parameters and the weighted distance to the parameters. In particular, rather than directly minimizing an error surface  $w \mapsto L(h_w, S_m)$ , they propose the following minimization problem over the so-called local-entropic loss:

$$\min_{w \in \mathbb{R}^d} \log \mathbb{E}_{W \sim \mathcal{N}_{w, 1/\gamma}} [C(\gamma) \exp\{-L(h_W, S_m)\}], \quad (8)$$

where  $\gamma > 0$  is a parameter and  $C(\gamma)$  a constant. In comparison, our algorithm can be interpreted as an optimization of the form

$$\min_{w \in \mathbb{R}^p, s \in \mathbb{R}_+^p} \mathbb{E}_{W \sim \mathcal{N}_{w,s}} [L(h_W, S_m)] + R(w, s) \quad (9)$$

where  $R$  serves as a regularizer that accounts for the generalization error by, roughly speaking, trying to expand the axis-aligned ellipsoid  $\{x \in \mathbb{R}^d : (w-x)^T \text{diag}(s)^{-1} (w-x) = 1\}$  and draw it closer to some point  $w_0$  near the origin. Comparing Eqs. (8) and (9) highlights similarities and differences. The local-entropic loss is sensitive to the volume of the regions containing good solutions. While the first term in our objective function looks similar, it does not, on its own, account for the volume of regions. This role is played by the second term, which prefers large regions (but also ones near the initialization  $w_0$ ). In our formulation, the first term is the empirical error of a stochastic neural network, which is precisely the term whose generalization error we are trying to bound. Entropy-SGD was not designed for the purpose of finding good stochastic neural networks, although it seems possible that having small local-entropic loss would lead to generalization for neural networks whose parameters are drawn from the local Gibbs distribution. Another difference is that, in our formulation, the diagonal covariance of the multivariate normal perturbation is learned adaptively,



and driven by the goal of minimizing error. The shape of the normal perturbation is not learned, although the region whose volume is being measured is determined by the error surface, and it seems likely that this volume will be larger than that spanned by a multivariate Gaussian chosen to lie entirely in a region with good loss.

Chaudhari et al. [Cha+17] give an informal characterization of the generalization properties of local-entropic loss in Bayesian terms by comparing the marginal likelihood of two Bayesian priors centered at a solution with small and large local-entropic loss. Informally, a Bayesian prior centered on an isolated solution will lead to small marginal likelihood in contrast to one centered in a wide valley. They give a formal result relying on the uniform stability of SGD [HRS15] to show under some strong (and admittedly unrealistic) conditions that Entropy-SGD generalizes better than SGD. The key property is that the local-entropic loss surface is smoother than the original error surface.

Other authors have found evidence of the importance of “flat” minima: Recent work by Keskar, Mudigere, Nocedal, Smelyanskiy, and Tang [Kes+17] finds that large-batch methods tend to converge to sharp / isolated minima and have worse generalization performance compared to mini-batch algorithms, which tend to converge to flat minima and have good generalization performance. The bulk of their paper is devoted to the problem of restoring good generalization behavior to batch algorithms.

Finally, our algorithm also bears resemblance to *graduated optimization*, an approach toward non-convex optimization attributed to Blake and Zisserman [BZ87] whereby a sequence of increasingly fine-grained versions of an optimization problem are solved in succession. (See [HLS16] and references therein.) In this context, Eq. (8) is the result of a local smoothing operation acting on the objective function  $w \mapsto \check{\ell}(h_w, S_M)$ . In graduate optimization, the effect of the local smoothing operation would be decreased over time, eventually disappearing. In our formulation, the act of balancing the empirical loss and generalization error serve to drive the evolution of the local smoothing in an adaptive fashion. Moreover, in the limit, the local smoothing does not vanish in our algorithm, as the volume spanned by the perturbations relates to the generalization error. Our results suggest that SGD solutions live inside relatively large volumes, and so perhaps SGD can be understood in terms of graduated optimization.

## 7 CONCLUSION AND FUTURE WORK

We obtain nonvacuous generalization bounds for deep neural networks with millions of parameters trained on

55000 MNIST examples. These bounds are obtained by optimizing an objective derived from the PAC-Bayes bound, starting from the solution produced by SGD. Despite the weights changing, the SGD solution remains well within the 1% ellipsoidal quantile, i.e., the volume spanned by the stochastic neural network contains the original SGD solution. (When labels are randomized, however, optimizing the PAC-Bayes bound causes the solution to shift considerably.)

Our experiments look only at fully connected feed forward networks trained on a binary class variant of MNIST. It would be interesting to see if the results extend to multiclass classification, to other data sets, and to other types of architectures, especially convolutional ones.

Our PAC-Bayes bound can be tightened in several ways. Highly dependent weights constrain the size of the axis-aligned ellipsoid representing the stochastic neural network. We can potentially recognize small populations of highly dependent weights, and optimize their covariance parameters, rather than enforcing independence in the posterior.

One might also consider replacing the multivariate normal posterior with a distribution that is more tuned to the loss surface. One promising avenue is to follow the lines of Chaudhari et al. [Cha+17] and consider (local) Gibbs distributions. If the solutions obtained by minimizing the local-entropic loss are flatter than those obtained by SGD, than we may be able to demonstrate quantitatively tighter bounds.

Finally, there is the hard work of understanding the generalization properties of SGD. In light of our work, it may be useful to start by asking whether SGD finds solutions in flat minima. Such solutions could then be lifted to stochastic neural networks with good generalization properties. Going from stochastic networks back to deterministic ones may require additional structure.

**Acknowledgments** This research was carried out while the authors were visiting the Simons Institute for the Theory of Computing at UC Berkeley. The authors would like to thank Peter Bartlett, Shai Ben-David, Dylan Foster, Matus Telgarsky, and Ruth Urner for helpful discussions. GKD is supported by an EPSRC studentship. DMR is supported by an NSERC Discovery Grant, Connaught Award, and U.S. Air Force Office of Scientific Research grant #FA9550-15-1-0074.

## REFERENCES

- [Bal+15] C. Baldassi, A. Ingrosso, C. Lucibello, L. Saglietti, and R. Zecchina. “Subdominant Dense Clusters Allow for Simple Learning

- and High Computational Performance in Neural Networks with Discrete Synapses”. *Phys. Rev. Lett.* 115 (12 Sept. 2015), p. 128101.
- [Bal+16] C. Baldassi, C. Borgs, J. T. Chayes, A. Ingrosso, C. Lucibello, L. Saglietti, and R. Zecchina. “Unreasonable effectiveness of learning neural networks: From accessible states and robust ensembles to basic algorithmic schemes”. *Proceedings of the National Academy of Sciences* 113.48 (2016), E7655–E7662. eprint: <http://www.pnas.org/content/113/48/E7655.full.pdf>.
- [Bar17] P. L. Bartlett. “The impact of the nonlinearity on the VC-dimension of a deep network”. Preprint. 2017.
- [Bar97] P. L. Bartlett. “For valid generalization the size of the weights is more important than the size of the network”. In: *Advances in Neural Information Processing Systems*. 1997, pp. 134–140.
- [Bar98] P. L. Bartlett. “The sample complexity of pattern classification with neural networks: the size of the weights is more important than the size of the network”. *IEEE transactions on Information Theory* 44.2 (1998), pp. 525–536.
- [BM02] P. L. Bartlett and S. Mendelson. “Rademacher and Gaussian complexities: Risk bounds and structural results”. *Journal of Machine Learning Research* 3.Nov (2002), pp. 463–482.
- [BZ87] A. Blake and A. Zisserman. *Visual Reconstruction*. Cambridge, MA, USA: MIT Press, 1987.
- [Cha+17] P. Chaudhari, A. Choromanska, S. Soatto, Y. LeCun, C. Baldassi, C. Borgs, J. Chayes, L. Sagun, and R. Zecchina. “Entropy-SGD: Biasing Gradient Descent Into Wide Valleys”. In: *International Conference on Learning Representations (ICLR)*. 2017. arXiv: 1611.01838v4 [cs.LG].
- [Grü07] P. D. Grünwald. *The minimum description length principle*. MIT press, 2007.
- [HC93] G. E. Hinton and D. van Camp. “Keeping the Neural Networks Simple by Minimizing the Description Length of the Weights”. In: *Proceedings of the Sixth Annual Conference on Computational Learning Theory*. COLT ’93. Santa Cruz, California, USA: ACM, 1993, pp. 5–13.
- [HLS16] E. Hazan, K. Y. Levy, and S. Shalev-Shwartz. “On Graduated Optimization for Stochastic Non-Convex Problems”. In: *Proceedings of the 33rd International Conference on Machine Learning (ICML)*. 2016, pp. 1833–1841.
- [HRS15] M. Hardt, B. Recht, and Y. Singer. “Train faster, generalize better: Stability of stochastic gradient descent”. *CoRR* abs/1509.01240 (2015).
- [HS97] S. Hochreiter and J. Schmidhuber. “Flat Minima”. *Neural Comput.* 9.1 (Jan. 1997), pp. 1–42.
- [Kes+17] N. S. Keskar, D. Mudigere, J. Nocedal, M. Smelyanskiy, and P. T. P. Tang. “On Large-Batch Training for Deep Learning: Generalization Gap and Sharp Minima”. In: *International Conference on Learning Representations (ICLR)*. 2017. arXiv: 1609.04836v2 [cs.LG].
- [KP02] V. Koltchinskii and D. Panchenko. “Empirical margin distributions and bounding the generalization error of combined classifiers”. *Annals of Statistics* (2002), pp. 1–50.
- [Lan02] J. Langford. “Quantitatively tight sample complexity bounds”. Carnegie Mellon University, 2002.
- [LC02] J. Langford and R. Caruana. “(Not) Bounding the True Error”. In: *Advances in Neural Information Processing Systems 14*. Ed. by T. G. Dietterich, S. Becker, and Z. Ghahramani. MIT Press, 2002, pp. 809–816.
- [LCB10] Y. LeCun, C. Cortes, and C. J. C. Burges. *MNIST handwritten digit database*. <http://yann.lecun.com/exdb/mnist/>. 2010.
- [LS01] J. Langford and M. Seeger. *Bounds for Averaging Classifiers*. Tech. rep. CMU-CS-01-102. Carnegie Mellon University, 2001.
- [McA99] D. A. McAllester. “PAC-Bayesian Model Averaging”. In: *Proceedings of the Twelfth Annual Conference on Computational Learning Theory*. COLT ’99. Santa Cruz, California, USA: ACM, 1999, pp. 164–170.
- [NSS15] B. Neyshabur, R. Salakhutdinov, and N. Srebro. “Path-SGD: Path-Normalized Optimization in Deep Neural Networks”. In: *Advances in Neural Information Processing Systems*. Vol. 28. NIPS. 2015. arXiv: 1506.02617v1 [cs.LG].
- [NTS14] B. Neyshabur, R. Tomioka, and N. Srebro. *In Search of the Real Inductive Bias: On the Role of Implicit Regularization in Deep Learning*. Workshop track poster at ICLR 2015. 2014. arXiv: 1412.6614v4 [cs.LG].