

# 000 001 002 003 004 005 006 007 008 009 010 011 012 013 014 015 016 017 018 019 020 021 022 023 024 025 026 027 028 029 030 031 032 033 034 035 036 037 038 039 040 041 042 043 044 045 046 047 048 049 050 051 052 053 GENERALIZATION OF GIBBS AND LANGEVIN MONTE CARLO ALGORITHMS IN THE INTERPOLATION REGIME

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## ABSTRACT

The paper provides data-dependent bounds on the test error of the Gibbs algorithm in the overparameterized interpolation regime, where low training errors are also obtained for impossible data, such as random labels in classification. The bounds are stable under approximation with Langevin Monte Carlo algorithms. Experiments on the MNIST and CIFAR-10 datasets verify that the bounds yield nontrivial predictions on true labeled data and correctly upper bound the test error for random labels. Our method indicates that generalization in the low-temperature, interpolation regime is already signaled by small training errors in the more classical high temperature regime.

## 1 INTRODUCTION

Modern learning algorithms can achieve very small training errors on arbitrary data if the underlying hypothesis space is large enough. For reasonable data originating from real-world problems, the chosen hypotheses also tend to have small test errors, a fortunate circumstance, which has given great technological and economic thrust to deep learning. Unfortunately, the same algorithms also achieve very small training errors for data specifically designed to produce very large test errors, such as random labels in classification. Consequently, the hypothesis space and the training error do not suffice to predict the test error. The key to generalization must be more deeply buried in the data. While not so disquieting to practitioners, this mystery has troubled theoreticians for many years (Zhang et al., 2016; 2021), and it seems safe to say that the underlying mechanisms still have not been completely understood.

We are far from solving this riddle in generality, but for the Gibbs posterior we show how nontrivial bounds on the test error can be recovered from the training data. The Gibbs posterior assigns probabilities, which decrease exponentially with the training error of the hypotheses. The exponential decay parameter  $\beta$  can be interpreted as an inverse temperature in an analogy to statistical physics. The Gibbs measure is a sufficient idealization to have tractable theoretical properties, but also the limiting distribution of several concrete stochastic algorithms, here summarized as Langevin Monte Carlo (LMC), including Stochastic Gradient Langevin Dynamics (SGLD), (Gelfand & Mitter, 1991; Welling & Teh, 2011), a popular modern learning algorithm.

When  $\beta$  is large and the hypothesis space is rich, these algorithms can reproduce the dilemma described above by achieving very small training errors on data designed to have large test errors. Our paper addresses this *interpolation regime* of the Gibbs posterior and makes the following three contributions:

- We give high-probability data-dependent bounds on the test error, both for a hypothesis drawn from the Gibbs posterior and for the posterior mean, assuming that we can freely draw samples from it. These bounds holds for the entire range of temperatures.
- We weaken the above assumption by showing that the bounds are stable under approximations of the posterior in the total variation and  $W_2$ -Wasserstein metrics. Given sufficient computing resources, this yields bounds for LMC algorithms.
- We give high-probability data-dependent bounds on the test error, both for a hypothesis drawn from the Gibbs posterior and for the posterior mean, assuming that we can freely draw samples from the posterior. These bounds hold for the entire range of temperatures.

Our method is based on a combination of the PAC-Bayesian bounds (McAllester, 1999; Alquier, 2021; Rivasplata et al., 2020) with an integral representation of the log-partition function. This makes it possible to bound the logarithm of the density of the Gibbs posterior at a given temperature in terms of empirical averages at higher temperatures. A qualitative conclusion is that generalization in the under-regularized low-temperature regime ( $\beta > n$ ) is already indicated by small training errors in the over-regularized high-temperature regime ( $\beta < n$ ), where  $n$  is the number of training examples.

### 1.1 RELATED LITERATURE

Many papers address the generalization of the Gibbs algorithm and Langevin Monte Carlo, with special focus on SGLD, which is the most popular algorithm. Most similar to this work is Raginsky et al. (2017), which bounds the distance to the Gibbs posterior and then its generalization error. Their bound, however, applies only to the high temperature regime  $\beta < n$ .

Several works concentrate on the optimization path of SGLD. Mou et al. (2018) gives both stability and PAC-Bayesian bounds. Pensia et al. (2018) applies the information theoretic generalization bounds of Xu & Raginsky (2017). These ideas are further developed by Negrea et al. (2019), where random subsets of the training data are used to define data-dependent priors. Farghly & Rebeschini (2021) gives time-independent bounds for SGLD, which are further improved by Futami & Fujisawa (2024). Most of the bounds in the above papers are in expectation. The very recent paper of Harel et al. (2025) gives a very elegant argument for Markov chain algorithms based on the second law of thermodynamics. If the invariant distribution is the Gibbs posterior, the bound along the entire optimization path is of order  $\sqrt{\beta/n}$  but improvable to  $\beta/n$ .

Some papers give similar bounds for the Gibbs posterior, roughly of the form  $\beta/n$  or  $\sqrt{\beta/n}$  (Raginsky et al., 2017; Dziugaite & Roy, 2018; Kuzborskij et al., 2019; Rivasplata et al., 2020) or Maurer (2024) and Harel et al. (2025)). These bounds hold equally for random labels and are therefore vacuous for overparametrized hypothesis spaces in the low temperature regime  $\beta > n$ . To our knowledge, ours is the only bound for the Gibbs posterior, which is valid in this regime.

Other bounds have been developed for specific algorithms designed to optimize them. The milestone paper by Dziugaite & Roy (2017) is the most prominent example, and (Dziugaite & Roy, 2018) and (Pérez-Ortiz et al., 2021) are also in this category. Our bounds by contrast apply to the Gibbs posterior and LMC in their standard forms.

## 2 PRELIMINARIES

The relative entropy of two Bernoulli variables with expectations  $p$  and  $q$  is denoted

$$\kappa(p, q) = p \ln \frac{p}{q} + (1-p) \ln \frac{1-p}{1-q}. \quad (1)$$

We also define the function  $\kappa^{-1} : [0, 1] \times [0, \infty) \rightarrow [0, 1]$  by

$$\kappa^{-1}(p, t) = \inf \{q : q \geq p, \kappa(p, q) \geq t\}.$$

Throughout the following  $(\mathcal{X}, \Sigma)$  is a measurable space of *data* with probability measure  $\mu$ . The i.i.d. random vector  $\mathbf{x} \sim \mu^n$  is the training sample.

We let  $(\mathcal{H}, \Omega)$  be a measurable space of *hypotheses*, and let  $\ell : \mathcal{H} \times \mathcal{X} \rightarrow [0, \infty)$  be a prescribed loss function. Members of  $\mathcal{H}$  are denoted  $h$  or  $g$ . We write  $L(h) := \mathbb{E}_{x \sim \mu} [\ell(h, x)]$  and  $\hat{L}(h, \mathbf{x}) := (1/n) \sum_i \ell(h, x_i)$  respectively for the true (expected) and empirical error of hypothesis  $h \in \mathcal{H}$ . The set of probability measures on  $(\mathcal{H}, \Omega)$  is denoted  $\mathcal{P}(\mathcal{H})$ .

A stochastic algorithm is a function  $\nu : \mathcal{X}^n \rightarrow \mathcal{P}(\mathcal{H})$ , which assigns to a training sample  $\mathbf{x}$  a probability measure  $\nu(\mathbf{x}) \in \mathcal{P}(\mathcal{H})$ . The KL-divergence between two probability measures is the function  $\text{KL} : (\rho, \nu) \in \mathcal{P}(\mathcal{H}) \times \mathcal{P}(\mathcal{H}) \mapsto \mathbb{E}_{h \sim \rho} [\ln \frac{d\rho}{d\nu}]$  if  $\rho$  absolutely continuous w.r.t.  $\nu$ , otherwise the value is  $\infty$ . The total variation distance is defined as  $d_{TV} : (\rho, \nu) \in \mathcal{P}(\mathcal{H}) \times \mathcal{P}(\mathcal{H}) \mapsto \sup_{A \in \Omega} |\rho(A) - \nu(A)|$ . The  $W_p$ -Wasserstein distance is  $W_p(\rho, \nu) = (\inf_W \mathbb{E}_{(x,y) \sim W} [\|x - y\|^p])^{1/p}$  with the infimum over all probability measures on  $\mathcal{P}(\mathcal{H} \times \mathcal{H})$  with  $\rho$  and  $\nu$  as marginals.

There is an a-priori reference measure  $\pi \in \mathcal{P}(\mathcal{H})$ , called the *prior*. With a fixed prior, the Gibbs algorithm at inverse temperature  $\beta > 0$  is the stochastic algorithm  $G_\beta : \mathbf{x} \in \mathcal{X}^n \mapsto G_\beta(\mathbf{x}) \in \mathcal{P}(\mathcal{H})$

108 defined by

$$109 \quad G_\beta(\mathbf{x})(A) = \frac{1}{Z_\beta(\mathbf{x})} \int_A e^{-\beta \hat{L}(h, \mathbf{x})} d\pi(h) \text{ for } A \in \Omega.$$

110  $G_\beta(\mathbf{x})$  is called the *Gibbs-posterior*, the normalizing factor

$$111 \quad Z_\beta(\mathbf{x}) := \int_{\mathcal{H}} e^{-\beta \hat{L}(h, \mathbf{x})} d\pi(h)$$

112 is called the *partition function*. The motivation for the Gibbs posterior is that it puts larger weights on  
113 hypotheses with smaller empirical error.

114 Given a stochastic algorithm  $\nu$  we define a probability measure  $\rho_\nu$  on  $\mathcal{H} \times \mathcal{X}^n$  by

$$115 \quad \rho_\nu(A) = \mathbb{E}_{\mathbf{x} \sim \mu^n} \mathbb{E}_{h \sim \nu(\mathbf{x})} [1_A(h, \mathbf{x})] \text{ for } A \in \Omega \otimes \Sigma^{\otimes n}. \quad (2)$$

116 Then,  $\mathbb{E}_{(h, \mathbf{x}) \sim \rho_\nu} [\phi(h, \mathbf{x})] = \mathbb{E}_{\mathbf{x}} \mathbb{E}_{h \sim \nu(\mathbf{x})} [\phi(h, \mathbf{x})]$  for measurable  $\phi : \mathcal{H} \times \mathcal{X}^n \rightarrow \mathbb{R}$ . To draw the  
117 pair  $(h, \mathbf{x})$  from  $\rho_\nu$  we first draw the training sample  $\mathbf{x}$ , and then sample  $h$  from  $\nu(\mathbf{x})$ . The main  
118 objective in learning is that the risk  $\mathbb{E}_{x \sim \mu} [f(h, x)]$  is small with high probability in  $(h, \mathbf{x}) \sim \rho_\nu$ ,  
119 where  $f$  is some application-dependent loss function, possibly different from  $\ell$ . In the sequel we will  
120 give corresponding guarantees.

### 121 3 BOUNDS FOR THE GIBBS POSTERIOR

122 In this section, we make the idealized assumption that we are free to sample from the Gibbs posterior  
123 at any finite  $\beta \geq 0$ .

#### 124 3.1 AN INTEGRAL REPRESENTATION OF THE FREE ENERGY

125 **Lemma 3.1.** *Let  $0 = \beta_0 < \beta_1 < \dots < \beta_K = \beta$ . Then*

$$126 \quad -\ln Z_\beta(\mathbf{x}) = \int_0^\beta \mathbb{E}_{h \sim G_\gamma(\mathbf{x})} [\hat{L}(h, \mathbf{x})] d\gamma \leq \sum_{k=1}^K (\beta_k - \beta_{k-1}) \mathbb{E}_{g \sim G_{\beta_{k-1}}(\mathbf{x})} [\hat{L}(g, \mathbf{x})].$$

127 *Proof.* Let  $A(\beta) = -\ln Z_\beta(\mathbf{x})$ . One verifies the identities

$$128 \quad A(0) = 0,$$

$$129 \quad A'(\beta) = \frac{1}{Z_{\beta, \pi}(\mathbf{x})} \int_{\mathcal{H}} \hat{L}(h, \mathbf{x}) e^{-\beta \hat{L}(h, \mathbf{x})} d\pi(h) = \mathbb{E}_{h \sim G_\beta(\mathbf{x})} [\hat{L}(h, \mathbf{x})],$$

$$130 \quad A''(\beta) = -\left( \mathbb{E}_{h \sim G_\beta(\mathbf{x})} [\hat{L}(h, \mathbf{x})^2] - (\mathbb{E}_{h \sim G_\beta(\mathbf{x})} [\hat{L}(h, \mathbf{x})])^2 \right) \leq 0.$$

131 The equality in the lemma then follows from the first two identities above and the fundamental  
132 theorem of calculus, and the inequality follows from the last identity, which shows that  
133  $\mathbb{E}_{g \sim G_{\beta_{k-1}, \pi}(\mathbf{x})} [\hat{L}(g, \mathbf{x})]$  is non-increasing in  $\beta$ .  $\square$

134 In statistical physics there is a formal analogy, where the function  $h \mapsto \hat{L}(h, \mathbf{x})$  is the ( $\mathbf{x}$ -dependent)  
135 energy of the system in the state  $h$ , and  $\beta$  is the inverse temperature. The Gibbs posterior then  
136 becomes the "canonical ensemble" (Gibbs, 1902), describing the probability of states in equilibrium  
137 with a heat bath at temperature  $\beta^{-1}$ . The function  $\beta \mapsto A(\beta)$  plays an important role:  $\beta^{-1} A(\beta)$   
138 is the Helmholtz free energy,  $A'(\beta) = \mathbb{E}_{h \sim G_\beta(\mathbf{x})} [\hat{L}(h, \mathbf{x})]$  is the thermal average of the energy,  
139  $-\beta A'(\beta) + A(\beta)$  is the entropy and  $-A''(\beta)$  is proportional to the heat capacity at temperature  $\beta^{-1}$   
140 (see e.g. Huang, 2008).

141 For  $h \in \mathcal{H}$ ,  $\mathbf{x} \in \mathcal{X}^n$  and an increasing sequence  $\beta = (\beta_1 < \dots < \beta_K)$  of positive numbers, we  
142 denote

$$143 \quad \Gamma(h, \mathbf{x}, \beta) = -\beta_K \hat{L}(h, \mathbf{x}) + \sum_{k=1}^K (\beta_k - \beta_{k-1}) \mathbb{E}_{g \sim G_{\beta_{k-1}}(\mathbf{x})} [\hat{L}(g, \mathbf{x})]. \quad (3)$$

144 So Lemma 3.1 states that, when  $\beta_0 = 0$ , then,

$$145 \quad -\beta_K \hat{L}(h, \mathbf{x}) - \ln Z_{\beta_K}(\mathbf{x}) \leq \Gamma(h, \mathbf{x}, \beta). \quad (4)$$

146 Note that  $\Gamma(h, \mathbf{x}, \beta)$  depends *only* on the training data  $\mathbf{x}$ , the sequence  $\beta$  and the hypothesis  $h$ .

162 3.2 BOUNDS  
163164 The function  $F$  in the following is a placeholder for a random variable related to the generalization  
165 gap, which we would like to bound with high probability.166 **Theorem 3.2.** *Let  $F : \mathcal{H} \times \mathcal{X}^n \rightarrow \mathbb{R}$  be some measurable function,  $\beta > 0$  and  $\beta = (\beta_1 < \dots < \beta_K)$   
167 as above with  $\beta_0 = 0$  and  $\beta_K = \beta$ . Then,*168 (i) *for  $\delta > 0$  with probability at least  $1 - \delta$  in  $\mathbf{x} \sim \mu^n$  and  $h \sim G_\beta(\mathbf{x})$* 

170 
$$F(h, \mathbf{x}) \leq \Gamma(h, \mathbf{x}, \beta) + \ln \mathbb{E}_\mathbf{x} \mathbb{E}_{g \sim \pi} [e^{F(g, \mathbf{x})}] + \ln(1/\delta),$$
  
171

172 (ii) *for  $\delta > 0$  with probability at least  $1 - \delta$  in  $\mathbf{x} \sim \mu^n$* 

174 
$$\mathbb{E}_{h \sim G_\beta(\mathbf{x})} [F(h, \mathbf{x})] \leq \mathbb{E}_{h \sim G_\beta(\mathbf{x})} [\Gamma(h, \mathbf{x}, \beta)] + \ln \mathbb{E}_\mathbf{x} \mathbb{E}_{g \sim \pi} [e^{F(g, \mathbf{x})}] + \ln(1/\delta).$$
  
175

176 *Proof.* By Markov's inequality, for any real random variable  $Y$   
177

178 
$$\Pr \{Y > \ln \mathbb{E}[e^Y] + \ln(1/\delta)\} = \Pr \{e^Y > \mathbb{E}[e^Y]/\delta\} \leq \delta.$$

179 To prove (i), we apply this to the random variable  $Y = F(h, \mathbf{x}) + \beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x})$  on the  
180 probability space  $(\mathcal{H} \times \mathcal{X}^n, \Omega \otimes \Sigma^{\otimes n}, \rho_{G_\beta})$  as defined in (2). Together with the definition of the  
181 Gibbs posterior, this gives, with probability at least  $1 - \delta$  in  $(h, \mathbf{x}) \sim \rho_{G_\beta}$  (equivalent to saying  
182  $\mathbf{x} \sim \mu^n$  and  $h \sim G_\beta(\mathbf{x})$ ),  
183

184 
$$\begin{aligned} & F(h, \mathbf{x}) + \beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x}) \\ & \leq \ln \mathbb{E}_\mathbf{x} \mathbb{E}_{g \sim G_\beta(\mathbf{x})} [e^{F(g, \mathbf{x}) + \beta \hat{L}(g, \mathbf{x}) + \ln Z_\beta(\mathbf{x})}] + \ln(1/\delta) \\ & = \ln \mathbb{E}_\mathbf{x} \mathbb{E}_{g \sim \pi} [e^{F(g, \mathbf{x}) + \beta \hat{L}(g, \mathbf{x}) + \ln Z_\beta(\mathbf{x}) - \beta \hat{L}(g, \mathbf{x}) - \ln Z_\beta(\mathbf{x})}] + \ln(1/\delta) \\ & = \ln \mathbb{E}_\mathbf{x} \mathbb{E}_{g \sim \pi} [e^{F(g, \mathbf{x})}] + \ln(1/\delta). \end{aligned}$$
  
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191 Subtract  $\beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x})$  and use (4). For (ii) apply Markov's inequality to  
192  $\mathbb{E}_{h \sim G_\beta(\mathbf{x})} [F(h, \mathbf{x}) + \beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x})]$  instead. By Jensen's inequality  
193

194 
$$e^{\mathbb{E}_{h \sim G_\beta(\mathbf{x})} [F(h, \mathbf{x}) + \beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x})]} \leq \mathbb{E}_{g \sim G_\beta(\mathbf{x})} [e^{F(g, \mathbf{x}) + \beta \hat{L}(g, \mathbf{x}) + \ln Z_\beta(\mathbf{x})}]$$
  
195

196 and proceed as above using (4). □  
197198 Up to the application of (4), the above proof of (i) just gives the single-draw version of the PAC-  
199 Bayesian bound as in Rivasplata et al. (2020) applied to the Gibbs posterior, while (ii) is the standard  
200 PAC-Bayesian bound applied to the Gibbs posterior until (4) is invoked.  
201202 3.3 LOSS FUNCTIONS AND SECONDARY LOSS FUNCTIONS  
203204 To apply Theorem 3.2, we need to control the exponential moment  $\mathbb{E}_\mathbf{x} \mathbb{E}_{g \sim \pi} [e^{F(g, \mathbf{x})}]$ , but otherwise  
205 we have free choice of the function  $F$ . This gives the method some flexibility. **By Tonelli's Theorem**  
206 we can exchange the two expectations, and often there is a bound on  $\mathbb{E}_\mathbf{x} [e^{F(g, \mathbf{x})}]$  uniform in  $g$ ,  
207 which then carries over to  $\mathbb{E}_{g \sim \pi} \mathbb{E}_\mathbf{x} [e^{F(g, \mathbf{x})}]$ , since  $\pi$  is a probability measure. In this way bounds  
208 for sub-Gaussian or sub-exponential losses can be obtained, but also for U-statistics or even non-i.i.d.  
209 data, sampled from the trajectories of time-homogeneous, ergodic Markov chains. In Section B.1  
210 in the appendix, we derive a bound for sub-Gaussian losses from Theorem 3.2; other examples are  
211 planned for a longer version of the paper.  
212213 The function  $F$  may be defined in terms of other, application-dependent loss functions, which are  
214 different from the loss  $\ell$ , which defines the Gibbs posterior and the functional  $\Gamma$ . To illustrate this  
215 point, let  $f : \mathcal{H} \times \mathcal{X} \rightarrow [0, 1]$  be measurable and set  $F(h, \mathbf{x}) = n \kappa (\frac{1}{n} \sum_i f(h, x_i), \mathbb{E}_\mathbf{x} [f(h, \mathbf{x})])$ ,  
with  $\kappa$  the relative entropy as in (1). Then, Theorem 1 of Maurer (2004) gives  $\mathbb{E}_\mathbf{x} [e^{F(h, \mathbf{x})}] \leq 2\sqrt{n}$   
for  $n \geq 8$ . Substitution in Theorem 3.2 and division by  $n$  then give the following corollary.

216 **Corollary 3.3.** Let  $f : \mathcal{H} \times \mathcal{X} \rightarrow [0, 1]$  be measurable,  $\delta > 0$  and  $n \geq 8$ . Then, with probability at  
217 least  $1 - \delta$  in  $\mathbf{x} \sim \mu^n$  and  $h \sim G_\beta(\mathbf{x})$

$$219 \quad \kappa \left( \frac{1}{n} \sum_i f(h, x_i), \mathbb{E}_x[f(h, x)] \right) \leq \frac{1}{n} \left( \Gamma(h, \mathbf{x}, \beta) + \ln \left( \frac{2\sqrt{n}}{\delta} \right) \right)$$

220 and with probability at least  $1 - \delta$  in  $\mathbf{x} \sim \mu^n$

$$223 \quad \kappa \left( \frac{1}{n} \sum_i \mathbb{E}_{h \sim G_\beta(\mathbf{x})} [f(h, x_i)], \mathbb{E}_{h \sim G_\beta(\mathbf{x})} \mathbb{E}_x [f(h, x)] \right) \leq \frac{1}{n} \left( \Gamma(h, \mathbf{x}, \beta) + \ln \left( \frac{2\sqrt{n}}{\delta} \right) \right).$$

226 For the second part, we used the joint convexity of  $\kappa$ . Under the conditions of this corollary, the  
227 second inequality becomes

$$229 \quad \mathbb{E}_{h \sim G_\beta(\mathbf{x})} \mathbb{E}_x [f(h, x)] \leq \kappa^{-1} \left( \frac{1}{n} \sum_i \mathbb{E}_{h \sim G_\beta(\mathbf{x})} [f(h, x_i)], \frac{1}{n} \left( \Gamma(h, \mathbf{x}, \beta) + \ln \left( \frac{2\sqrt{n}}{\delta} \right) \right) \right) \quad (5)$$

232 with an analogous version for the single-draw case. This is how we compute bounds in our experiments.  
233 For an illustration, please refer to C.2.1.

234 Here  $f$  plays the role of a secondary loss function, typically different from the loss function  $\ell$ , which  
235 defines the Gibbs posterior. In applications one would define the Gibbs posterior in terms of a  
236 differentiable, potentially unbounded loss function  $\ell$  and approximate it with a suitable Monte Carlo  
237 method. For classification, however, one is interested in bounding the 0-1 loss obtained by some  
238 threshold on  $\ell$ . For binary classification each  $x \in \mathcal{X}$  is of the form  $x = (z, y)$ , where  $y \in \{-1, 1\}$  is  
239 the label corresponding to features  $z$  and  $f(h, (z, y)) := 1_{(-\infty, 0)}(y\ell(h, z))$  is the 0-1 loss, which  
240 can be directly substituted in (5) above to bound the misclassification probability in terms of its  
241 empirical counterpart.

## 243 4 BOUNDS FOR LANGEVIN MONTE CARLO

245 For this section, we assume  $\mathcal{H} = \mathbb{R}^d$  and an isotropic Gaussian prior  $\pi$  of width  $\sigma$ . We condition on  
246 the training data  $\mathbf{x}$ , reference to which we omit. The Gibbs posterior is an idealization, from which it  
247 is impossible to sample directly. Nevertheless a number of works (Raginsky et al., 2017; Dalalyan &  
248 Karagulyan, 2017; Brosse et al., 2018; Vempala & Wibisono, 2019; Dwivedi et al., 2019; Nemeth &  
249 Fearnhead, 2021; Balasubramanian et al., 2022) discuss algorithms (SGLD, ULA, MALA, etc, here  
250 summarized as Langevin Monte Carlo (LMC)), capable of approximating a probability measure  $\nu$  on  
251  $\mathbb{R}^d$  of the form  $\nu \propto \exp(-V)$  or some nearby limiting distribution. In the following, we discuss one  
252 of these algorithms.

### 253 4.1 ULA

255 We focus on the results of Vempala & Wibisono (2019), which do not require convexity of  $V$  and  
256 instead assume that the measure  $\nu$  satisfies a log-Sobolev inequality (LSI) in the sense that for all  
257 smooth  $f : \mathbb{R}^d \rightarrow \mathbb{R}$

$$259 \quad \mathbb{E}_{h \sim \nu} [f^2(h) \ln f^2(h)] - \mathbb{E}_{h \sim \nu} [f^2(h)] \ln \mathbb{E}_{h \sim \nu} [f^2(h)] \leq \frac{2}{\alpha} \mathbb{E}_{h \sim \nu} [\|(\nabla f)(h)\|^2] \quad (6)$$

261 for some  $\alpha > 0$ . An LSI is satisfied when  $V$  is strongly convex, but, importantly, also for measures  
262 which are bounded perturbations of measures satisfying an LSI (Holley & Stroock (1986)). Vempala  
263 & Wibisono (2019) give further examples and a list of references for measures, which are not log-  
264 concave and satisfy an LSI. Raginsky et al. (2017) show, that under dissipativity conditions of the  
265 loss the Gibbs posterior  $G_\beta(\mathbf{x})$  satisfies an LSI with constant independent of  $\mathbf{x}$ .

266 Consider the iterative algorithm

$$267 \quad h_{t+1} = h_t - \epsilon \nabla V(h_t) + \sqrt{2\epsilon} \xi_t, \quad (7)$$

268 where  $\epsilon$  is a step size, the  $\xi_t \sim \mathcal{N}(0, I)$  are independent Gaussian vectors and  $h_0$  is drawn from some  
269 initial distribution  $\nu_0$ . Some authors call this algorithm simply LMC, for Langevin Monte Carlo. We

call it ULA, alongside Durmus & Moulines (2017), Dwivedi et al. (2019) and Vempala & Wibisono (2019), for Un-adjusted Langevin Algorithm, because it misses the Metropolis-type accept-reject step, which would guarantee that the invariant distribution is indeed the Gibbs posterior. A popular variant of ULA is Stochastic Gradient Langevin Dynamics (SGLD) (Welling & Teh, 2011; Raginsky et al., 2017) where the gradient is replaced by an unbiased estimate, typically realized with random minibatches. Here, we restrict ourselves to ULA with a constant step size, because it has the least number of parameters to adjust, but in experiments we also use the computationally more efficient SGLD.

As  $\epsilon \rightarrow 0$ , ULA recovers the Continuous Langevin Dynamics (CLD) given by the stochastic differential equation

$$dh_t = -\nabla V(h_t) dt + \sqrt{2} dB_t,$$

where  $B_t$  is centered standard Brownian motion in  $\mathbb{R}^d$ . CLD converges exponentially to the Gibbs posterior (Chiang et al., 1987). For  $\epsilon > 0$ , the distribution  $\nu_{\epsilon,t}$  of ULA converges as  $t \rightarrow \infty$  to a biased limiting distribution  $\nu_\epsilon$  which is generally different from  $\nu$ , but expected to be closer to  $\nu$  as  $\epsilon$  becomes smaller. Vempala & Wibisono (2019) use the LSI assumption and coupling to control the difference between CLD and ULA along their path and prove the following result.

**Theorem 4.1.** *Assume that  $\nu$  satisfies the log-Sobolev inequality (6) with  $\alpha > 0$ , that the Hessian of  $V$  satisfies  $-LI \preceq \nabla^2 V(h) \preceq LI$  for all  $h$  and some  $L < \infty$ , and that  $0 < \epsilon \leq \alpha / (4L^2)$ . Then, for  $t \geq 0$*

$$KL(\nu, \nu_{\epsilon,t}) \leq e^{-\alpha \epsilon t} KL(\nu, \nu_0) + \frac{8\epsilon d L^2}{\alpha}.$$

The first exponential term is due to the mismatch of the initial distribution and  $\nu$ . The second term bounds the divergence between the limiting distribution  $\nu_\epsilon$  and  $\nu$ . Similar results exist under different conditions on the potential  $V$ . Cheng et al. (2018) for example require  $V$  to be strongly convex outside of a ball instead of the log-Sobolev inequality and gives bounds in terms of the  $W_1$ -Wasserstein metric. Raginsky et al. (2017) give bounds for  $W_2$  under dissipativity assumptions. The next corollary adapts Theorem 4.1 to the situation studied in this paper.

**Corollary 4.2.** *For  $\beta > 0$  consider the Gibbs posterior  $G_\beta$  corresponding to  $\hat{L}(h)$ , with centered Gaussian prior of width  $\sigma$ . Assume that it satisfies the log-Sobolev inequality (6) with  $\alpha > 0$ , that the Hessian of  $\hat{L}$  satisfies  $-RI \preceq \nabla^2 \hat{L}(h) \preceq RI$  for all  $h$  and some  $R < \infty$ , and that  $0 < \eta \leq \alpha / (4(\beta R + \frac{1}{\sigma^2})^2)$ . Consider the algorithm*

$$h_{t+1} = h_t - \eta \nabla_h \hat{L}(h_t) - \frac{\eta h_t}{\beta \sigma^2} + \sqrt{\frac{2\eta}{\beta}} \xi_t, \quad (8)$$

where  $h_0 \sim \nu_0$  and the  $\xi_t \sim \mathcal{N}(0, I)$  are independent Gaussian random variables. Let  $D(\beta) = KL(G_\beta, \nu_0)$  and let  $\nu_{\beta,\eta,t}$  be the distribution of  $h_t$  after  $t$  steps. Then,

$$(i) KL(G_\beta, \nu_{\beta,\eta,t}) \leq e^{-\alpha \eta t / \beta} D(\beta) + \frac{8\eta d}{\beta \alpha} (\beta R + \frac{1}{\sigma^2})^2.$$

$$(ii) W_2(G_\beta, \nu_{\beta,\eta,t}) \leq \frac{2}{\alpha} e^{-\alpha \eta t / \beta} D(\beta) + \frac{16\eta d}{\beta \alpha^2} (\beta R + \frac{1}{\sigma^2})^2.$$

$$(iii) d_{TV}(G_\beta, \nu_{\beta,\eta,t}) \leq e^{-\alpha \eta t / (2\beta)} \sqrt{D(\beta)} + 2 \sqrt{\frac{\eta d}{\beta \alpha}} (\beta R + \frac{1}{\sigma^2}).$$

*Proof.* (i) follows directly from Theorem 4.1 and the substitutions  $V(h) = \beta \hat{L}(h) + \|h\|^2 / (2\sigma^2)$ ,  $\epsilon = \eta / \beta$  and  $L = \beta R + \frac{1}{\sigma^2}$ . Then  $\nu = G_\beta$  with Gaussian prior of width  $\sigma$ , and ULA becomes (8). (ii) follows from Theorem 1 of Otto & Villani (2000) and the LSI assumption, and (iii) follows from Pinsker's inequality (see e.g. Boucheron et al. (2013), Theorem 4.19).  $\square$

## 4.2 STABILITY OF THE BOUNDS

We now show the stability of our bounds for approximation in total variation and  $W_2$ -Wasserstein metrics, under boundedness or Lipschitz conditions. Together with Corollary 4.2 this implies bounds for the algorithm defined in (8).

We assume that there is a target approximation  $\nu_\beta(\mathbf{x})$  of  $G_\beta(\mathbf{x})$ , for which we want to compute a high probability bound, either for the single draw version on  $F(h, \mathbf{x})$  as  $\mathbf{x} \sim \mu^n$  and  $h \sim \nu_\beta(\mathbf{x})$ , or, for the classical PAC-Bayesian version, on  $\mathbb{E}_{h \sim \nu_\beta(\mathbf{x})}[F(h, \mathbf{x})]$  as  $\mathbf{x} \sim \mu^n$ . It is not surprising that the single-draw bound will require a much closer approximation of the Gibbs posterior.

Since the bounding functional  $\Gamma(h, \mathbf{x}, \beta)$  depends on the Gibbs posteriors  $G_{\beta_k}(\mathbf{x})$  for  $k \in \{1, \dots, K-1\}$ , we require corresponding approximations  $\nu_{\beta_k}$  of  $G_{\beta_k}(\mathbf{x})$  to compute the bound. To streamline notation, we define

$$\Gamma_\nu(h, \mathbf{x}, \beta) = -\beta \hat{L}(h, \mathbf{x}) + \sum_{k=1}^K (\beta_k - \beta_{k-1}) \mathbb{E}_{g \sim \nu_{\beta_{k-1}}(\mathbf{x})}[\hat{L}(g, \mathbf{x})]$$

for  $0 = \beta_0 < \beta_1 < \dots < \beta_K = \beta$  and  $(\nu_0(\mathbf{x}), \nu_{\beta_1}(\mathbf{x}), \dots, \nu_{\beta_{K-1}}(\mathbf{x})) \in \mathcal{P}(\mathcal{H})^K$ . Like  $\Gamma(h, \mathbf{x}, \beta)$ , the functional  $\Gamma_\nu(h, \mathbf{x}, \beta)$  depends on the training data, but it can also be computed by repeated execution of the algorithm (8). The next theorem states the obtained bound in terms of the approximation errors in total variation.

**Theorem 4.3.** *Suppose that  $\mathcal{H} = \mathbb{R}^d$  and that there are numbers  $m, M < \infty$  such that for every  $\mathbf{x}$  in  $\mathcal{X}^n$  and  $h \in \mathcal{H}$  we have  $|\ell(h, \mathbf{x})| \leq m$  and  $|F(h, \mathbf{x})| \leq M$ . Let  $0 = \beta_0 < \beta_1 < \dots < \beta_K = \beta$  and  $\nu_{\beta_k}(\mathbf{x}) \in \mathcal{P}(\mathcal{H})$  be such that  $d_{TV}(\nu_{\beta_k}(\mathbf{x}), G_{\beta_k}(\mathbf{x})) = \epsilon_{\beta_k}$ . Then,*

(i) *with probability at least  $1 - \delta$  as  $\mathbf{x} \sim \mu^n$  and  $h \sim \nu_\beta(\mathbf{x})$*

$$F(h, \mathbf{x}) \leq \Gamma_\nu(h, \mathbf{x}, \beta) + \ln \mathbb{E}_{\mathbf{x}} \mathbb{E}_{h \sim \pi} \left[ e^{F(h, \mathbf{x})} \right] + \ln \frac{1}{\delta} + \ln (2e^{M+\beta m} \epsilon_\beta) + \sum_{k=1}^K (\beta_k - \beta_{k-1}) m \epsilon_{\beta_{k-1}}.$$

(ii) *with probability at least  $1 - \delta$  as  $\mathbf{x} \sim \mu^n$*

$$\begin{aligned} \mathbb{E}_{h \sim \nu_\beta(\mathbf{x})}[F(h, \mathbf{x})] &\leq \mathbb{E}_{h \sim \nu_\beta(\mathbf{x})}[\Gamma_\nu(h, \mathbf{x}, \beta)] + \ln \mathbb{E}_{\mathbf{x}} \mathbb{E}_{h \sim \pi} \left[ e^{F(h, \mathbf{x})} \right] + \ln \frac{1}{\delta} \\ &\quad + (M + \beta m) \epsilon_\beta + \sum_{k=1}^K (\beta_k - \beta_{k-1}) m \epsilon_{\beta_{k-1}}. \end{aligned}$$

The proof, given in Section B.2, is similar to that of Theorem 3.2 and applies Markov's inequality with  $\nu_\beta$  instead of  $G_\beta$ . It then uses the fact that, if  $f$  is a bounded measurable function, then  $|\mathbb{E}_{\nu_1}[f] - \mathbb{E}_{\nu_2}[f]| \leq \|f\|_\infty d_{TV}(\nu_1, \nu_2)$ . For the single-draw version (i) this is applied to  $(\mathbb{E}_{\nu_\beta} - \mathbb{E}_{G_\beta}) \left[ e^{F(h, \mathbf{x}) + \beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x})} \right]$ , which causes the exponential dependence on  $\beta m$  and  $M$ .

For (ii) we can apply this in the exponent to  $(\mathbb{E}_{\nu_\beta} - \mathbb{E}_{G_\beta}) [F(h, \mathbf{x}) + \beta \hat{L}(h, \mathbf{x})]$ , and the logarithm makes the dependence linear. The rest of the proof is mechanical.

The last terms in (i) and (ii) are the additional errors due to the approximations of the Gibbs posteriors. The worst term is clearly the first one in (i) due to the exponential dependence on the proxy function  $F$ , which is typically of order  $n$  and on  $\beta$ , which is larger than  $n$  in the regime in which we are interested. In practice, the requirement of such an approximation is prohibitive for the single-draw version. The bound in (ii) has more moderate approximation requirements. In this case, we can also give bounds in terms of the  $W_2$ -Wasserstein metric (as guaranteed by Corollary 4.2), if  $F$  and  $\ell$  satisfy a Lipschitz condition instead of boundedness. We will use the following fact: Since  $W_1 \leq W_2$  it follows from the Kantorovich-Rubinstein Theorem (Villani, 2009), that for any real Lipschitz function  $f$  on  $\mathcal{H}$  and probability measures  $\nu_1, \nu_2 \in \mathcal{P}(\mathcal{H})$

$$|\mathbb{E}_{h \sim \nu_1}[f(h)] - \mathbb{E}_{h \sim \nu_2}[f(h)]| \leq \|f\|_{\text{Lip}} W_1(\nu_1, \nu_2) \leq \|f\|_{\text{Lip}} W_2(\nu_1, \nu_2),$$

where  $\|\cdot\|_{\text{Lip}}$  is the Lipschitz-seminorm. The following result is then immediate, with proof exactly as in (ii) of Theorem 4.3.

**Theorem 4.4.** *Assume the conditions of Theorem 4.3, except that instead of  $|\ell(h, \mathbf{x})| \leq m$  and  $|F(h, \mathbf{x})| \leq M$  we have  $\|\ell(\cdot, \mathbf{x})\|_{\text{Lip}} \leq m$  and  $\|F(\cdot, \mathbf{x})\|_{\text{Lip}} \leq M$  and that  $W_2(\nu_{\beta_k}(\mathbf{x}), G_\beta(\mathbf{x})) = \epsilon_{\beta_k}$ . Then, with probability at least  $1 - \delta$  as  $\mathbf{x} \sim \mu^n$*

$$\begin{aligned} \mathbb{E}_{h \sim \nu_\beta(\mathbf{x})}[F(h, \mathbf{x})] &\leq \mathbb{E}_{h \sim \nu_\beta(\mathbf{x})}[\Gamma_\nu(h, \mathbf{x}, \beta)] + \ln \mathbb{E}_{\mathbf{x}} \mathbb{E}_{h \sim \pi} \left[ e^{F(h, \mathbf{x})} \right] + \ln \frac{1}{\delta} \\ &\quad + (M + \beta m) \epsilon_\beta + \sum_{k=1}^K (\beta_k - \beta_{k-1}) m \epsilon_{\beta_{k-1}}. \end{aligned}$$

378 **5 EXPERIMENTS**  
 379

380 The purpose of our experiments is to show that our method gives nontrivial bounds on the test error for  
 381 real-world data, while correctly bounding the test error on impossible data, where the same algorithm  
 382 also achieves a small training error. The real-world data are either the MNIST dataset, subdivided into  
 383 the two classes of characters 0-4 and 5-9, or the CIFAR-10 dataset to distinguish between animals  
 384 and vehicles. For impossible data, we randomize the labels of the training data. Our experiments are  
 385 computationally heavy, so we generally use small sample sizes, from 2000 to 8000 examples. The  
 386 hypothesis space is the set of weight vectors for a neural network with ReLU activation functions  
 387 constrained by a Gaussian prior distribution with  $\sigma = 5$ . Neural network architectures are described  
 388 in Section C.1.1 of the appendix. To approximately sample the weight vectors in the vicinity of the  
 389 Gibbs posterior, we use ULA as in (8) or SGLD (Welling & Teh, 2011) with constant step size  $\eta$ . To  
 390 ensure reproducibility, we provide the code and experimental results in an anonymous repository at  
 391 <https://anonymous.4open.science/r/Gibbs-Generalization-45F1>.  
 392

393 **5.1 THE LOSS FUNCTION  $\ell$**

394 Most experiments were done with bounded loss functions  $\ell$ , either bounded binary cross-entropy  
 395 as described in Appendix D of Dziugaite & Roy (2018) or the Savage loss (Masnadi-Shirazi &  
 396 Vasconcelos, 2008). As unbounded loss function we tried binary cross-entropy (BCE) (Section C.2.7),  
 397 but with a smaller value of  $\sigma$ , so as to avoid excessive training errors for small values of  $\beta$ . We  
 398 compute bounds for the 0-1 loss, using the method described in Section 3.3.  
 399

400 **5.2 APPROXIMATING THE ERGODIC MEAN**  
 401

402 As we know of no sufficient criterion for convergence, we terminate iterations at time  $T$ , when a  
 403 very slow running mean  $\mathbb{M}_{\text{stop}}$  of the loss trajectory  $(\hat{L}(h_{\beta_k t}, \mathbf{x}))_{t=0}^T$  stops decreasing. A second  
 404 running mean  $\mathbb{M}_{\text{erg}}$  is used as an approximation of the ergodic mean and thus of expectations in the  
 405 invariant distribution. We thus replace all expectations  $\mathbb{E}_{h \sim G_{\beta_k}} [\hat{L}(h, \mathbf{x})]$  occurring in the bounds  
 406 by  $\mathbb{M}_{\text{erg}} [(\hat{L}(h_{\beta_k t}, \mathbf{x}))_{t=0}^T]$ . Both running means  $\mathbb{M}_{\text{stop}}$  and  $\mathbb{M}_{\text{erg}}$  are implemented as first-order,  
 407 recursive lowpass filters described in Section C.1.3 of the appendix.  
 408

409 **5.3 CALIBRATION**  
 410

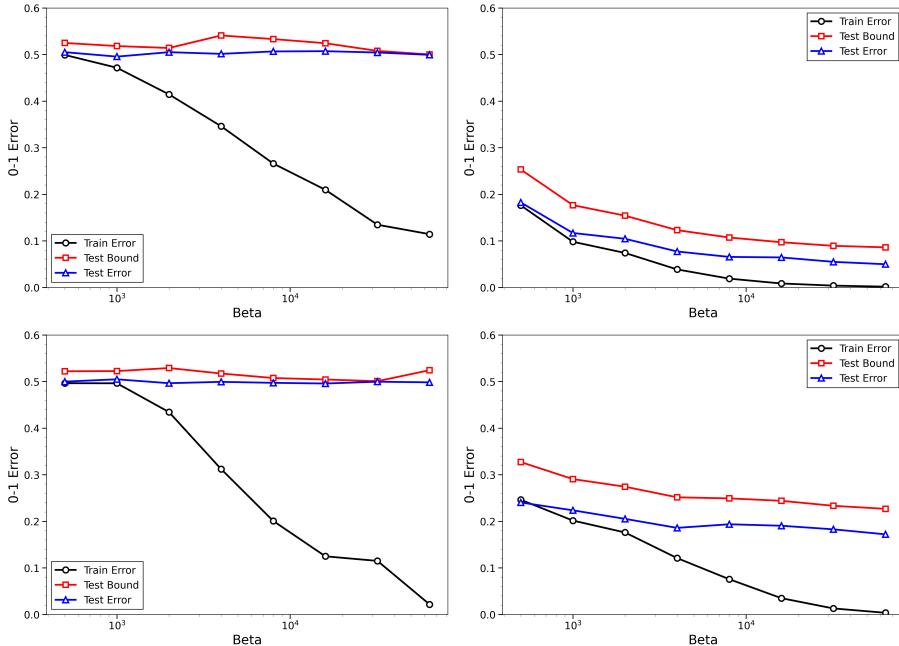
411 The theoretical bounds of Corollary 4.2 in combination with Theorem 4.3 can only serve as guidance  
 412 for the computation of practical bounds, because the quantities  $R$  and  $\alpha$  are impossible to estimate  
 413 in practice. But even if we assume these to be in the order of unity, the bounds are too coarse to  
 414 distinguish between different temperatures with realistic stepsizes.  
 415

416 A simple calculation shows that  $\text{KL}(G_{\beta}, G_{2\beta}) \leq \beta \left( \mathbb{E}_{G_{\beta}} [\hat{L}] - \mathbb{E}_{G_{2\beta}} [\hat{L}] \right) \leq \beta \mathbb{E}_{G_{\beta}} [\hat{L}]$  (Lemma  
 417 B.5 in Appendix B.3). By Corollary 4.2 we should therefore have at least  $8\eta dR^2/\alpha < \mathbb{E}_{G_{\beta}(\mathbf{x})} [\hat{L}]$   
 418 to distinguish between the expectations in the Gibbs posterior for  $\beta$  and  $2\beta$ . The smallest neural  
 419 network we use has  $d = 392,500$ . If  $\ell$  has values in  $[0, 1]$  then  $\mathbb{E}_{G_{\beta}(\mathbf{x})} [\hat{L}] \leq 1$ , so even if  $R$  and  
 420  $\alpha$  are set to 1, we would need stepsizes in the order of  $10^{-7}$ . Safe values of  $\eta$ , as suggested by the  
 421 theoretical results in Section 4, are therefore impossible in practice, and the bound has to be adapted  
 422 to a realistic choice of  $\eta$ .  
 423

424 The first possibility is to simply ignore the un-estimable error terms in Theorem 4.3, and to compute  
 425 the bounds from  $\Gamma_{\nu}(h, \mathbf{x}, \beta)$  in place of  $\Gamma(h, \mathbf{x}, \beta)$  as in Theorem 3.2. We show some of these  
 426 uncalibrated bounds, which already make nontrivial predictions, in Section C.2.6.  
 427

428 A second method uses a single calibration parameter, whose value is computed from the training  
 429 data. We assume that the computed functional  $\Gamma_{\nu}(h, \mathbf{x}, \beta)$  fails to estimate  $\Gamma(h, \mathbf{x}, \beta)$  by a factor  
 430  $r(\mathbf{x}) > 0$ , which we define as the smallest factor of  $\Gamma_{\nu}$ , for which we obtain a correct upper bound  
 431 on the 01-error with random labels for all the  $\beta_k$ . For a precise definition see Section B.4.  
 432

433 It is a purely experimental finding, that our choice of  $r$  leads to correct and surprisingly tight upper  
 434 bounds on the test error of correctly labeled data in all cases we tried. We emphasize that our  
 435 calibration procedure depends only on the training data.  
 436

432 5.4 RESULTS  
433

456 Figure 1: SGLD on MNIST and CIFAR-10 with 8000 training examples, MNIST above and CIFAR-  
457 10 below, random labels on the left, correct labels on the right. Both random and true labels are  
458 trained with the same algorithm and parameters on a fully connected ReLU network with two hidden  
459 layers of 1000 and 1500 units, respectively. The calibration factor for MNIST is 0.77, for CIFAR-10  
460 0.89. Train error, test error and our bound for the Gibbs posterior average of the 0-1 loss are plotted  
461 against  $\beta$ .

463 Several experiments confirm the validity of the proposed bounds. An example is shown in Figure 1,  
464 where a fully connected ReLU-network with two hidden layers of 1000 (respectively 1500) units each  
465 is trained with SGLD at inverse temperatures  $\beta = 0, 500, 1000, 2000, 4000, 8000, 16000, 32000$ ,  
466 and 64000. The train error for random labels is about 0.1 (or even less) at  $\beta = 64000$ , where the  
467 bound is above 0.5. The test error for correct labels, however, is tightly bounded above.

468 Notice that for MNIST, which has the tightest bounds, the training error for the true labels is rapidly  
469 decreasing from 0.5 to 0.17 at  $\beta = 500$  and to 0.1 at  $\beta = 1000$ . The more moderate initial decrease  
470 for CIFAR-10 corresponds to the tendency to overfit on this more difficult dataset. This confirms the  
471 intuition, that good generalization at low temperatures is already announced in the high temperature  
472 regime.

473 We generally found the uncalibrated bounds for ULA tighter than those for SGLD, consistent with  
474 the findings of Brosse et al. (2018). Experimental bounds for single draws from the posterior and  
475 various other experiments are reported in Section C.2.

477 6 CONCLUSION  
478

479 Using the integral representation of the log-partition function, the Gibbs posterior admits the compu-  
480 tation of upper bounds on the true error based on the training data and for any temperature. These  
481 bounds are stable under perturbation in the total-variation and Wasserstein metrics, and can be  
482 approximated by Langevin Monte Carlo (LMC) algorithms. However, for realistic experiments, the  
483 approximations obtained by these algorithms are coarse and require calibration, which leads to rather  
484 tight bounds in the interpolation regime of overparametrized neural networks.

485 The fact that the calibrated bounds are very tight is, at this point, a purely experimental finding,  
486 requiring more theoretical investigation in future work.

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594  
595 APPENDIX596  
597 In this appendix, we summarize a glossary of notation, give additional theoretical results and  
598 missing proofs, and provide more information on the numerical experiments, as well as additional  
599 experimental results.600  
601 A TABLE OF NOTATION  
602

Notation	Brief description	Section
$\mathcal{X}$	space of data	2
$\Sigma$	sigma algebra (events) on $\mathcal{X}$	2
$\mu$	probability of data	2
$n$	sample size	1, 2
$\mathbf{x}$	generic member $(x_1, \dots, x_n) \in \mathcal{X}^n$ , training sample	2
$\mathcal{H}$	hypothesis space	2
$\Omega$	sigma algebra (events) on $\mathcal{H}$	2
$\ell$	$\ell : \mathcal{H} \times \mathcal{X} \rightarrow [0, \infty)$ loss function	2
$f$	secondary loss function	3.3
$\mathcal{P}(\mathcal{H})$	probability measures on $\mathcal{H}$	2
$\pi$	nonnegative a-priori measure on $\mathcal{H}$	2
$\sigma$	width of Gaussian prior	4
$L(h)$	$L(h) = \mathbb{E}_{x \sim \mu}[h(x)]$ , expected loss of $h \in \mathcal{H}$	2
$\hat{L}(h, \mathbf{x})$	$\hat{L}(h, \mathbf{x}) = (1/n) \sum_{i=1}^n \ell(h, x_i)$ , empirical loss of $h \in \mathcal{H}$	2
$\beta$	inverse temperature	1, 2
$Z_\beta(\mathbf{x})$	partition function	2
$G_{\beta, \pi}(\mathbf{x})$	Gibbs posterior with energy $\hat{L}$ and prior $\pi$	2
$\mathbb{E}_{g \sim G_\beta(\mathbf{x})}$	posterior expectation	2
$\beta$	increasing sequence $(\beta_1 < \dots < \beta_K)$ of positive reals	3.1
$\Gamma(h, \mathbf{x}, \beta)$	bounding functional	3.1
$F(h, \mathbf{x})$	placeholder for generalization gap	3.2
$\kappa$	$kl(p, q) = p \ln \frac{p}{q} + (1-p) \ln \frac{1-p}{1-q}$ , rel. entropy of Bernoulli variables	2
$KL(\rho, \nu)$	$\int \left( \ln \frac{d\rho}{d\nu} \right) d\rho$ , KL-divergence of $\rho, \nu \in \mathcal{P}(\mathcal{H})$	2, 4.1, 4.2
$d_{TV}(\rho, \nu)$	total variation distance	2, 4.1, 4.2
$W_p(\rho, \nu)$	$p$ -Wasserstein distance	2, 4.1, 4.2
$\Gamma_\nu(h, \mathbf{x}, \beta)$	LMC approximation of $\Gamma(h, \mathbf{x}, \beta)$	4.2
$\eta$	step size or learning rate	4.1
$\nu_{\beta, \eta}$	invariant measure of LMC approximation of $G_\beta$ with step size $\eta$	4.1
$\nu_{\beta, \eta, t}$	LMC approximation of $G_\beta$ with step size $\eta$ at iteration $t$	4.1
$r(\mathbf{x})$	calibration factor	5.3, B.4
$\tilde{\mathbf{x}}$	randomly labeled data	5.3, B.4
$\mathbb{M}_{\text{stop}}, \mathbb{M}_{\text{erg}}$	filters for stopping and ergodic mean	5.2, C.1.3

636  
637 B ADDITIONAL RESULTS AND PROOFS  
638

## 639 B.1 SUB-GAUSSIAN LOSSES

640  
641 The freedom in the choice of  $F$  allows a number of bounds to be derived from Theorem 3.2. A  
642 centered real random variable  $Y$  is called  $\sigma$ -sub-Gaussian if  $\ln \mathbb{E} e^{\lambda Y - \mathbb{E} Y} \leq \lambda^2 \sigma^2 / 2$  for all  $\lambda \in \mathbb{R}$ .  
643 Now, suppose that for some real function  $f$  all the  $x \in \mathcal{X} \mapsto f(h, x)$  are  $\sigma$ -sub-Gaussian as  $x \sim \mu$ .  
644 Let  $\hat{L}(h, \mathbf{x}) = \frac{1}{n} \sum_{i=1}^n f(h, x_i)$  and  $L(h) = \mathbb{E}_x[f(h, x)]$ . Then,  $\mathbf{x} \in \mathcal{X}^n \mapsto \hat{L}(h, \mathbf{x})$  as  $\mathbf{x} \sim \mu^n$  is  
645  $\sigma/\sqrt{n}$ -sub-Gaussian. It is tempting to set  $F(h, \mathbf{x}) = \lambda (L(h) - \hat{L}(h, \mathbf{x}))$  in Theorem 3.2, divide  
646 by  $\lambda$  and then optimize over  $\lambda$ . Unfortunately, the last step is impossible, since the optimal  $\lambda$  is  
647 data-dependent in its dependence on  $\Gamma$  and ruins the exponential moment bound on  $F$ . A more  
careful argument establishes the following.

648 **Corollary B.1.** Suppose that for all  $h \in \mathcal{H}$  the random variables  $x \in \mathcal{X} \mapsto f(h, x)$  as  $x \sim \mu$   
 649 are  $\sigma$ -sub-Gaussian. For  $\delta > 0$  with probability at least  $1 - \delta$  as  $\mathbf{x} \sim \mu^n$  and  $h \sim G_{\beta, \pi}(\mathbf{x})$  if  
 650  $\Gamma(h, \mathbf{x}, \beta) \geq 1$ , then,  
 651

$$652 E_x[f(h, x)] - \frac{1}{n} \sum_i f(h, x_i) \leq \sigma \sqrt{\frac{2[\Gamma(h, \mathbf{x}, \beta)(1 + 1/n) + \ln(\Gamma(h, \mathbf{x}, \beta)(n + 1)/\delta)]}{n}}.$$

653 For the proof, we use the following auxiliary result.  
 654

655 **Lemma B.2.** (Anthony & Bartlett, 1999, Lemma 15.6) Suppose  $\Pr$  is a probability distribution and  
 656

$$657 \{E(\alpha_1, \alpha_2, \delta) : 0 < \alpha_1, \alpha_2, \delta \leq 1\}$$

658 is a set of events, such that  
 659

660 (i) For all  $0 < \alpha \leq 1$  and  $0 < \delta \leq 1$ ,

$$661 \Pr\{E(\alpha, \alpha, \delta)\} \leq \delta.$$

662 (ii) For all  $0 < \alpha_1 \leq \alpha \leq \alpha_2 \leq 1$  and  $0 < \delta_1 \leq \delta \leq 1$

$$663 E(\alpha_1, \alpha_2, \delta_1) \subseteq E(\alpha, \alpha, \delta).$$

664 Then for  $0 < a, \delta < 1$ ,  
 665

$$666 \Pr \bigcup_{\alpha \in (0, 1]} E(\alpha a, \alpha, \delta \alpha(1 - a)) \leq \delta.$$

667 We put this lemma in a more convenient form.  
 668

669 **Lemma B.3.** Let  $Y$  and  $X \geq 0$  be real random variables,  $\psi : \mathbb{R} \times (0, 1) \rightarrow \mathbb{R}$  be increasing in the  
 670 1st argument and  $\forall C > 1$ ,  $\delta \in (0, 1)$ ,

$$671 \Pr\{X \leq C \wedge Y > \psi(C, \delta)\} < \delta.$$

672 Then, for every  $\epsilon > 0$

$$673 \Pr \left\{ X \geq 1 \wedge Y > \psi \left( X(1 + \epsilon), \frac{\delta \epsilon}{X(1 + \epsilon)} \right) \right\}.$$

674 *Proof.* This follows from Lemma B.2 using the events  
 675

$$676 E(\alpha_1, \alpha_2, \delta) = \{X \leq \alpha_2^{-1} \wedge Y > f(\alpha_1^{-1}, \delta)\}$$

677 and  $a = 1/(1 + \epsilon)$ . □  
 678

679 *Proof of Corollary B.1.* Take  $F = \lambda(L(h) - \hat{L}(h, \mathbf{x}))$ , so  $\ln \mathbb{E}_{\mathbf{x}} \mathbb{E}_{g \sim \pi} [e^{F(g, \mathbf{x})}] \leq \lambda^2 \sigma^2 / (2n)$ .  
 680 From Theorem 3.2 and the properties of sub-Gaussian variables we get with  $\lambda = \sigma^{-1} \sqrt{2n(C + \ln(1/\delta))}$  that  
 681

$$\begin{aligned} 682 & \Pr \left\{ \Gamma(h, \mathbf{x}, \beta) \leq C \wedge L(h) - \hat{L}(h, \mathbf{x}) > \sigma \sqrt{\frac{2(C + \ln(1/\delta))}{n}} \right\} \\ 683 &= \Pr \left\{ \Gamma(h, \mathbf{x}, \beta) \leq C \wedge L(h) - \hat{L}(h, \mathbf{x}) > \frac{C + \ln(1/\delta)}{\lambda} + \frac{\lambda \sigma^2}{2n} \right\} \\ 684 &= \Pr \left\{ \Gamma(h, \mathbf{x}, \beta) \leq C \wedge \lambda(L(h) - \hat{L}(h, \mathbf{x})) > C + \lambda^2 \sigma^2 / (2n) + \ln(1/\delta) \right\} \leq \delta. \end{aligned}$$

685 Substitution in Lemma B.3 with  $\psi(C, \delta) = \sigma \sqrt{2(C + \ln(1/\delta)) / n}$ ,  $X = \Gamma(h, \mathbf{x}, \beta)$ ,  $Y = L(h) - \hat{L}(h, \mathbf{x})$  and  $\epsilon = 1/n$  gives Corollary B.1. □  
 686

702 B.2 PROOFS FOR SECTION 4.2  
703

704 Restatement of Theorem 4.3:

705 **Theorem B.4.** Suppose that  $\mathcal{H} = \mathbb{R}^d$  and that there are numbers  $m, M < \infty$  such that for every  $\mathbf{x}$   
706 in  $\mathcal{X}^n$  and  $h \in \mathcal{H}$  we have  $|\ell(h, \mathbf{x})| \leq m$  and  $|F(h, \mathbf{x})| \leq M$ . Let  $0 = \beta_0 < \beta_1 < \dots < \beta_K = \beta$   
707 and  $\nu_{\beta_k}(\mathbf{x}) \in \mathcal{P}(\mathcal{H})$  be such that  $d_{TV}(\nu_{\beta_k}(\mathbf{x}), G_{\beta_k}(\mathbf{x})) = \epsilon_{\beta_k}$ . Then,708 (i) with probability at least  $1 - \delta$  as  $\mathbf{x} \sim \mu^n$  and  $h \sim \nu_\beta(\mathbf{x})$ 

710 
$$F(h, \mathbf{x}) \leq \Gamma_\nu(h, \mathbf{x}, \beta) + \ln \mathbb{E}_\mathbf{x} \mathbb{E}_{h \sim \pi} \left[ e^{F(h, \mathbf{x})} \right] + \ln \frac{1}{\delta}$$
  
711 
$$+ \ln(2e^{M+\beta m} \epsilon_\beta) + \sum_{k=1}^K (\beta_k - \beta_{k-1}) m \epsilon_{\beta_{k-1}}.$$
  
712  
713  
714

715 (ii) with probability at least  $1 - \delta$  as  $\mathbf{x} \sim \mu^n$ 

716 
$$\mathbb{E}_{h \sim \nu_\beta(\mathbf{x})} [F(h, \mathbf{x})] \leq \mathbb{E}_{h \sim \nu_\beta(\mathbf{x})} [\Gamma_\nu(h, \mathbf{x}, \beta)] + \ln \mathbb{E}_\mathbf{x} \mathbb{E}_{h \sim \pi} \left[ e^{F(h, \mathbf{x})} \right] + \ln \frac{1}{\delta}$$
  
717 
$$+ (M + \beta m) \epsilon_\beta + \sum_{k=1}^K (\beta_k - \beta_{k-1}) m \epsilon_{\beta_{k-1}}.$$
  
718  
719  
720  
721

722 *Proof.* By the bound on  $\ell$  we have

723 
$$\Gamma(h, \mathbf{x}, \beta) \leq \Gamma_\nu(h, \mathbf{x}, \beta) + \sum_{k=1}^K (\beta_k - \beta_{k-1}) m \epsilon_{\beta_{k-1}}. \quad (9)$$
  
724  
725  
726

727 (i) From Markov's inequality we have (in analogy to the proof of Theorem 3.2) with probability at  
728 least  $1 - \delta$  as  $x \sim \mu^n$  and  $h \sim \nu_\beta(\mathbf{x})$ , that

729 
$$\begin{aligned} & F(h, \mathbf{x}) + \beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x}) \\ 730 & \leq \ln \mathbb{E}_\mathbf{x} \mathbb{E}_{h \sim \nu_\beta(\mathbf{x})} \left[ e^{F(h, \mathbf{x}) + \beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x})} \right] + \ln(1/\delta) \\ 731 & \leq \ln \left( \mathbb{E}_\mathbf{x} \mathbb{E}_{h \sim G_\beta(\mathbf{x})} \left[ e^{F(h, \mathbf{x}) + \beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x})} \right] + e^{M+\beta m} \epsilon_\beta \right) + \ln(1/\delta) \\ 732 & = \ln \left( \mathbb{E}_\mathbf{x} \mathbb{E}_{h \sim \pi} \left[ e^{F(h, \mathbf{x})} \right] + e^{M+\beta m} \epsilon_\beta \right) + \ln(1/\delta) \\ 733 & \leq \ln \mathbb{E}_\mathbf{x} \mathbb{E}_{h \sim \pi} \left[ e^{F(h, \mathbf{x})} \right] + \ln(2e^{M+\beta m} \epsilon_\beta) + \ln(1/\delta). \end{aligned}$$
  
734  
735  
736  
737  
738

739 In the second inequality we used  $\ln Z_\beta(\mathbf{x}) \leq 0$  and in the last line we used for  $a, b \geq 1$  that  
740  $\ln(a + b) \leq \ln \max\{a, b\} + \ln 2 \leq \ln a + \ln b + \ln 2 = \ln a + \ln 2b$ . Subtract  $\beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x})$ ,  
741 use (4) and (9).742 (ii) Again with Markov's inequality, with probability at least  $1 - \delta$  as  $x \sim \mu^n$ 

743 
$$\begin{aligned} & \mathbb{E}_{h \sim \nu_\beta(\mathbf{x})} [F(h, \mathbf{x}) + \beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x})] \\ 744 & \leq \ln \mathbb{E}_{\mathbf{x} \sim \mu^n} \left[ e^{\mathbb{E}_{h \sim \nu_\beta(\mathbf{x})} [F(h, \mathbf{x}) + \beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x})]} \right] \\ 745 & \leq \ln \mathbb{E}_{\mathbf{x} \sim \mu^n} \left[ e^{\mathbb{E}_{h \sim G_\beta(\mathbf{x})} [F(h, \mathbf{x}) + \beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x})] + (M+\beta m) \epsilon_\beta} \right]. \end{aligned}$$
  
746  
747  
748

749 In the second inequality we used the fact that  $\ln Z_\beta(\mathbf{x}) \leq 0$  and the bounds on  $F$  and  $\ell$ . Then,  
750 Jensen's inequality bounds the last line as

751 
$$\begin{aligned} & \ln \mathbb{E}_{\mathbf{x} \sim \mu^n} \mathbb{E}_{h \sim G_\beta(\mathbf{x})} \left[ e^{F(h, \mathbf{x}) + \beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x})} \right] e^{(M+\beta m) \epsilon_\beta} \\ 752 & = \ln \mathbb{E}_{\mathbf{x} \sim \mu^n} \mathbb{E}_{h \sim \pi} \left[ e^{F(h, \mathbf{x})} \right] + (M + \beta m) \epsilon_\beta. \end{aligned}$$
  
753  
754  
755

Again subtract  $\beta \hat{L}(h, \mathbf{x}) + \ln Z_\beta(\mathbf{x})$ , use (4) and (9).  $\square$

756 B.3 MISCELLANEOUS LEMMATA  
757759 **Lemma B.5.** For  $0 < \beta < \infty$   
760

761 
$$\max \{KL(G_\beta, G_{2\beta}), KL(G_{2\beta}, G_2)\} \leq \beta \left( \mathbb{E}_{h \sim G_\beta} [\hat{L}(h)] - \mathbb{E}_{h \sim G_{2\beta}} [\hat{L}(h)] \right)$$
  
762

763 *Proof.* Using Lemma 3.1  
764

765 
$$\begin{aligned} 766 \quad KL(G_\beta, G_{2\beta}) &= \mathbb{E}_{h \sim G_\beta} [-\beta \hat{L}(h) - \ln Z_\beta + 2\beta \hat{L}(h) + \ln Z_{2\beta}] \\ 767 &= \mathbb{E}_{h \sim G_\beta} [\beta \hat{L}(h)] - \int_\beta^{2\beta} \mathbb{E}_{h \sim G_\gamma} [\hat{L}(h)] d\gamma \\ 768 &\leq \beta \left( \mathbb{E}_{h \sim G_\beta} [\hat{L}(h)] - \mathbb{E}_{h \sim G_{2\beta}} [\hat{L}(h)] \right). \\ 770 & \\ 771 \end{aligned}$$

772 Similarly  
773

774 
$$\begin{aligned} 775 \quad KL(G_{2\beta}, G_2) &= \mathbb{E}_{h \sim G_{2\beta}} [-2\beta \hat{L}(h) - \ln Z_{2\beta} + \beta \hat{L}(h) + \ln Z_\beta] \\ 776 &= -\mathbb{E}_{h \sim G_\beta} [\beta \hat{L}(h)] + \int_\beta^{2\beta} \mathbb{E}_{h \sim G_\gamma} [\hat{L}(h)] d\gamma \\ 777 &\leq \beta \left( \mathbb{E}_{h \sim G_\beta} [\hat{L}(h)] - \mathbb{E}_{h \sim G_{2\beta}} [\hat{L}(h)] \right). \\ 779 & \\ 780 \end{aligned}$$

781  $\square$   
782  
783  
784785 B.4 THE CALIBRATION FACTOR  
786787 We assume that the computed functional  $\Gamma_\nu(h, \mathbf{x}, \beta)$  fails to estimate  $\Gamma(h, \mathbf{x}, \beta)$  by a factor  $r(\mathbf{x}) > 0$ ,  
788 which we compute as

789 
$$790 \quad r(\mathbf{x}) = \min \left\{ r : \forall k \in [K], \kappa^{-1} \left( \mathbb{E}_{h \sim \nu_{\beta_k}(\mathbf{x})} [\hat{L}_{01}(h, \tilde{\mathbf{x}})], \frac{1}{n} \left( r \Gamma_\nu(h, \tilde{\mathbf{x}}, \beta_1^k) + \ln \frac{2\sqrt{n}}{\delta} \right) \right) \geq \frac{1}{2} \right\}, \\ 791$$

792 where  $\tilde{\mathbf{x}}$  is the training set  $\mathbf{x}$  with random labels and  $\hat{L}_{01}$  the empirical 01-error. The calibration value  
793  $r$  is thus the smallest factor of  $\Gamma_\nu$ , for which we obtain a correct upper bound on the 01-error with  
794 random labels for all the  $\beta_k$ .  
795796 We emphasize that the calibration procedure depends only on the training data.  
797798 C EXPERIMENTAL DETAILS AND ADDITIONAL RESULTS  
799800 C.1 EXPERIMENTAL DETAILS  
801802 All the codes to reproduce the results are provided through this <https://anonymous.4open.science/r/Gibbs-Generalization-45F1>. For all the experiments we use an isotropic  
803 Gaussian prior with  $\mu = 0$ , for bounded loss with  $\sigma = 5$  and for unbounded loss with  $\sigma = 0.1$ . This  
804 induces an L2-regularization term in the energy function that is stated in the proof of Corollary 4.2.  
805 The confidence parameter  $\delta$  appearing in our bounds is set to 0.01 for all experiments  
806807 We use either standard SGLD or ULA with a constant step size and without additional correction  
808 terms. When ULA has been used, we use a step size of 0.01 for both datasets. However with SGLD,  
809 we set the step size to 0.01 for MNIST and 0.005 for CIFAR-10. For both datasets, MNIST and  
CIFAR-10, we use neural networks with ReLU activation functions.

810 C.1.1 NETWORK ARCHITECTURE  
811

812 The fully connected networks consist of one, two, three hidden layers, each containing a constant  
813 number of units. Besides that we are using LeNet-5 architecture for MNIST and VGG16 architecture  
814 for CIFAR-10 to achieve low test error. For loss function  $\ell$ , we are mostly using bounded loss  
815 function such as bounded binary cross-entropy (BBCE) as described in Appendix D of Dziugaite &  
816 Roy (2018) or the Savage loss (Masnadi-Shirazi & Vasconcelos, 2008). As unbounded loss function  
817 we tried binary cross-entropy (BCE) (Section C.2.7), but with a smaller value of  $\sigma$ , so as to avoid  
818 excessive training errors for small values of  $\beta$ .

819 The LeNet-5 network follows a systematic pattern of alternating convolutional and pooling layers,  
820 followed by fully connected layers (LeCun et al., 2002). It begins with an input layer that accepts  
821  $32 \times 32$  grayscale images. Thus, we pad our images to fit. The first convolutional layer (C1) applies  
822 6 filters of size  $5 \times 5$  to extract low-level features, followed by a  $2 \times 2$  average pooling layer (S2) for  
823 spatial downsampling. The second convolutional layer (C3) uses 16 filters of size  $5 \times 5$  to capture  
824 more complex feature combinations, followed again by a  $2 \times 2$  average pooling layer (S4). A third  
825 convolutional layer (C5) with 120 filters of size  $5 \times 5$  acts as a feature extractor, producing 120  
826 feature maps, each of size  $1 \times 1$ . The architecture concludes with two fully connected layers: F6 with  
827 84 neurons and a final output layer with 10 neurons for the original digit classification task. However,  
828 for our binary classification task, we modify F6 to have 420 neurons and use a single-neuron output  
829 layer. Throughout the network, ReLU activation functions replace the original tanh activations, which  
830 improves gradient flow and training performance in modern implementations.

830 VGG-16 is a widely used deep convolutional neural network architecture known for its simplicity and  
831 strong performance in image classification tasks (Simonyan & Zisserman, 2014). The architecture  
832 follows a consistent design using only  $3 \times 3$  convolutional filters and  $2 \times 2$  max pooling operations  
833 throughout the network. In our implementation, VGG-16 is adapted to handle CIFAR-10's smaller  
834  $32 \times 32$  RGB images. The network consists of 13 convolutional layers organized into five blocks: the  
835 first two blocks contain two convolutional layers each with 64 and 128 filters, respectively, while the  
836 last three blocks contain three convolutional layers each with 256, 512, and 512 filters, respectively.  
837 Each block is followed by a  $2 \times 2$  max pooling layer for spatial downsampling. All convolutional  
838 layers employ  $3 \times 3$  kernels with padding to preserve spatial dimensions, and ReLU activation  
839 functions introduce non-linearity. The convolutional feature extractor is followed by a classifier head  
840 consisting of three fully connected layers: two hidden layers with 1024 neurons each, using ReLU  
841 activation, and a final output layer with 1 neurons for binary classification. We also removed dropout  
842 to ensure that SGLD minimizes the defined energy function without any additional terms.

843 For MNIST, the input is a 784-dimensional vector, and the output is a scalar since we perform binary  
844 classification between digits 0–4 and 5–9. For CIFAR-10, the input dimension is 3072, and the output  
845 is again scalar, corresponding to binary classification between vehicles and animals. For evaluating  
846 our models, we are using all 10,000 test examples for both datasets.

847 C.1.2 MINIBATCHES  
848

849 When using SGLD, we adopt minibatches of size proportional to  $\sqrt{n}$ . Thus, for  $n = 2000$  the  
850 mini-batch size is 50, and for  $n = 8000$  it is 100.

851 C.1.3 MOVING AVERAGE FILTERS  
852

853 As we explained in Section 5.2, we are using a running mean  $\mathbb{M}(x_1, \dots, x_t)$  of  $\hat{L}(h_j, \mathbf{x})$  from  
854  $j = 1, \dots, t$  both as a criterion to stop the experiment and an estimation for  $\mathbb{E}_{h \sim G_{\beta_k}} [\hat{L}(h, \mathbf{x})]$ . We  
855 define the running mean recursively in one of two ways:  
856

$$857 \mathbb{M}_t = \frac{\alpha}{2} \hat{L}(h_t, \mathbf{x}) + \frac{\alpha}{2} \hat{L}(h_{t-1}, \mathbf{x}) + (1 - \alpha) \mathbb{M}_{t-1}, \\ 858 \mathbb{M}_t = \alpha \hat{L}(h_t, \mathbf{x}) + (1 - \alpha) \mathbb{M}_{t-1},$$

859 with  $\mathbb{M}_0 = 1$  and small  $\alpha$ . We use the first (symmetric) form in the experiments with ULA, and the  
860 second (standard exponential moving average) form with SGLD for convenience. We set different  
861 values of  $\alpha$  for the two roles:  $\alpha = 0.0025$  for the stopping criterion ( $\mathbb{M}_{\text{stop}}$ ) and  $\alpha = 0.01$  for

864 approximating the ergodic mean ( $\mathbb{M}_{\text{erg}}$ ). The stopping rule is triggered when  
 865

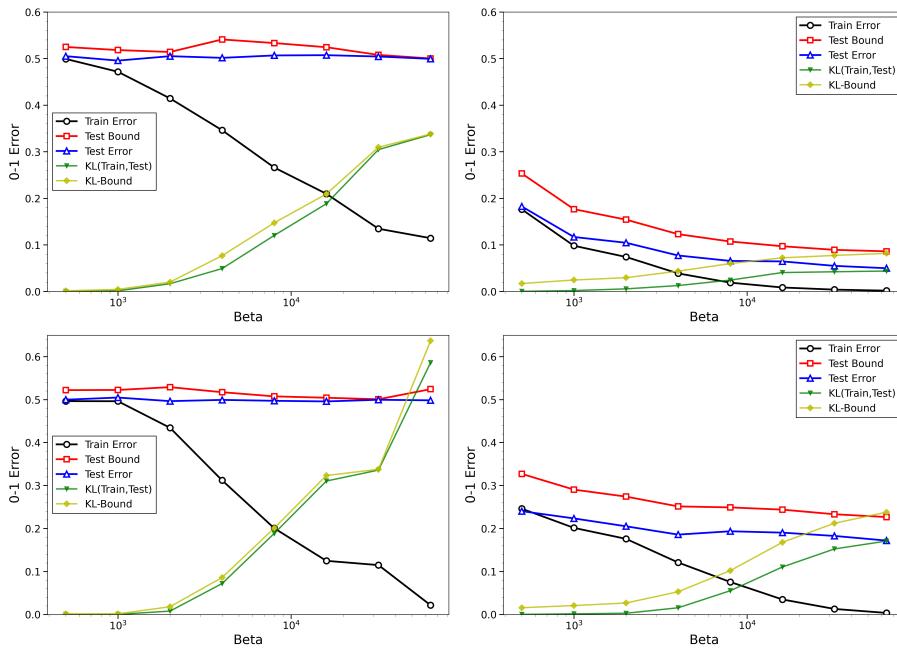
$$\mathbb{M}_t - \mathbb{M}_{t-1} \geq \epsilon,$$

867 with  $\epsilon = 10^{-7}$ . To avoid premature termination, we impose a minimum of 4000 steps before applying  
 868 this criterion. As  $\alpha \rightarrow 0$  and  $t \rightarrow \infty$ , the quantity  $\mathbb{M}_t$  converges to the ergodic mean.  
 869

## 870 C.2 EXPERIMENTAL RESULTS

### 872 C.2.1 ILLUSTRATION OF BOUND COMPUTATION

874 In this section, we demonstrate again the figure in the main body in more details. The figure 2  
 875 illustrates how our bounds are computed. The sequence of mean training losses in  $\ell$  is used to  
 876 compute for each  $\beta$  the functional  $\Gamma$  and the "KL-Bound", which corresponds to the right hand side of  
 877 the inequalities in Corollary 3.3. Our bound on the test loss is then computed by applying the function  
 878  $\kappa^{-1}$  to the empirical 0-1 error and to this kl-bound. The graph of "KL(Train, Test)" corresponds to  
 879 the left hand side in Corollary 3.3.  
 880 It is remarkable that the close fit of the upper bound on the random labels is achieved by the adjustment  
 881 of a single calibration parameter.



903 Figure 2: A more detailed version of Figure 1 to illustrate how the bounds are computed.  
 904

### 905 C.2.2 SINGLE-DRAWS

907 For the setting described in Section 5.4, we also present the bounds for the single-draw case in  
 908 Figure 3. It is noteworthy that, although the theoretical guarantees for this scenario are rather weak,  
 909 the empirical bounds behave well. However, as visible in the plots, the results exhibit fluctuations  
 910 and irregularities caused by stochastic effects, which make them less reliable.  
 911

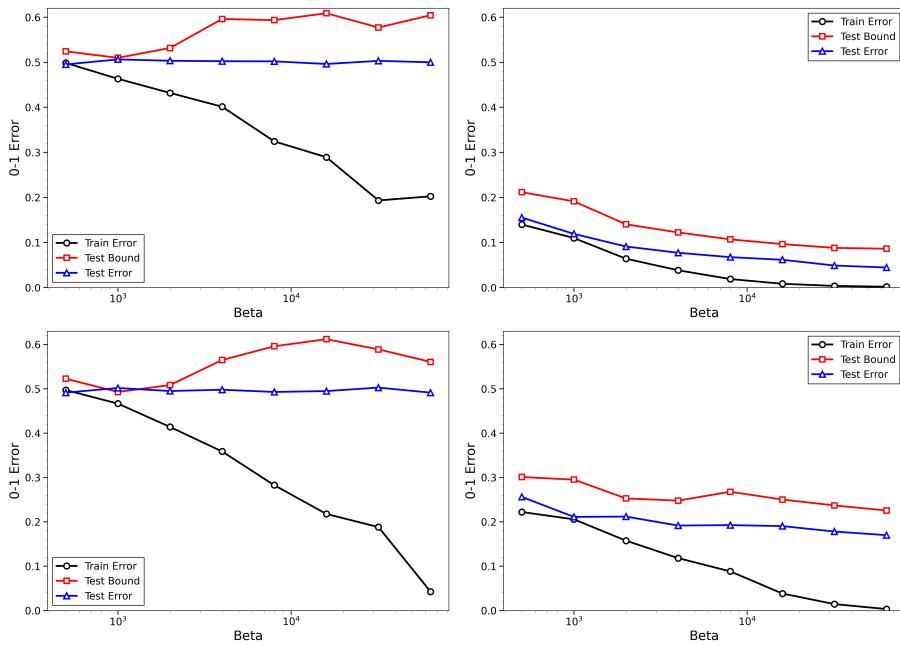


Figure 3: SGLD on MNIST and CIFAR-10 with 8000 training examples using BBCE loss function. The first row corresponds to MNIST and the second row to CIFAR-10. Random labels are shown on the left, correct labels on the right. Both random and true labels are trained with exactly the same algorithm and parameters on a fully connected ReLU network with two hidden layers of 1000 (respectively 1500) units. The calibration factor for MNIST is 0.77, for CIFAR-10 0.89. Train error, test error and our bound for a single-draw of the 0-1 loss are plotted against  $\beta$ .

#### C.2.3 DIFFERENT ARCHITECTURES

In this section, we evaluate the performance of different models and architectures on both MNIST and CIFAR-10, demonstrating that our bound can be used to guide model selection. In addition to the two-hidden-layer neural networks described in Section 1, we consider fully connected neural networks with three hidden layers, containing 500 and 1000 units for MNIST and CIFAR-10, respectively. Furthermore, we employ the LeNet-5 architecture for MNIST and VGG-16 for CIFAR-10 to achieve high test accuracy. Detailed descriptions of these architectures are provided in Section C.1.1.

Figure 4 demonstrates the robustness of our bound across different models. We observe that the bounds can be very tight even when the test error is small. For convolutional neural networks, especially on the MNIST dataset, we observe strong performance with the true labels, but relatively poor performance with random labels, despite having more parameters than training examples. This can be explained by the fact that convolutional architectures are still far from being highly overparameterized. For the MNIST dataset, we use fully connected neural networks with two or three hidden layers, containing 1000 or 500 units per layer, respectively. This corresponds to a total of approximately 1,787,000 and 893,000 parameters, resulting in a parameter-to-training-example ratio of roughly 200 and 100, respectively. In contrast, LeNet-5 has around 100,000 parameters, yielding a ratio of approximately 12.5.

The empirical test bounds can serve as a selection criterion among different models. Table 1 show that test bounds at low temperature are useful for model selection, and that bounds at high temperature can also predict the behavior of the model at low temperature.

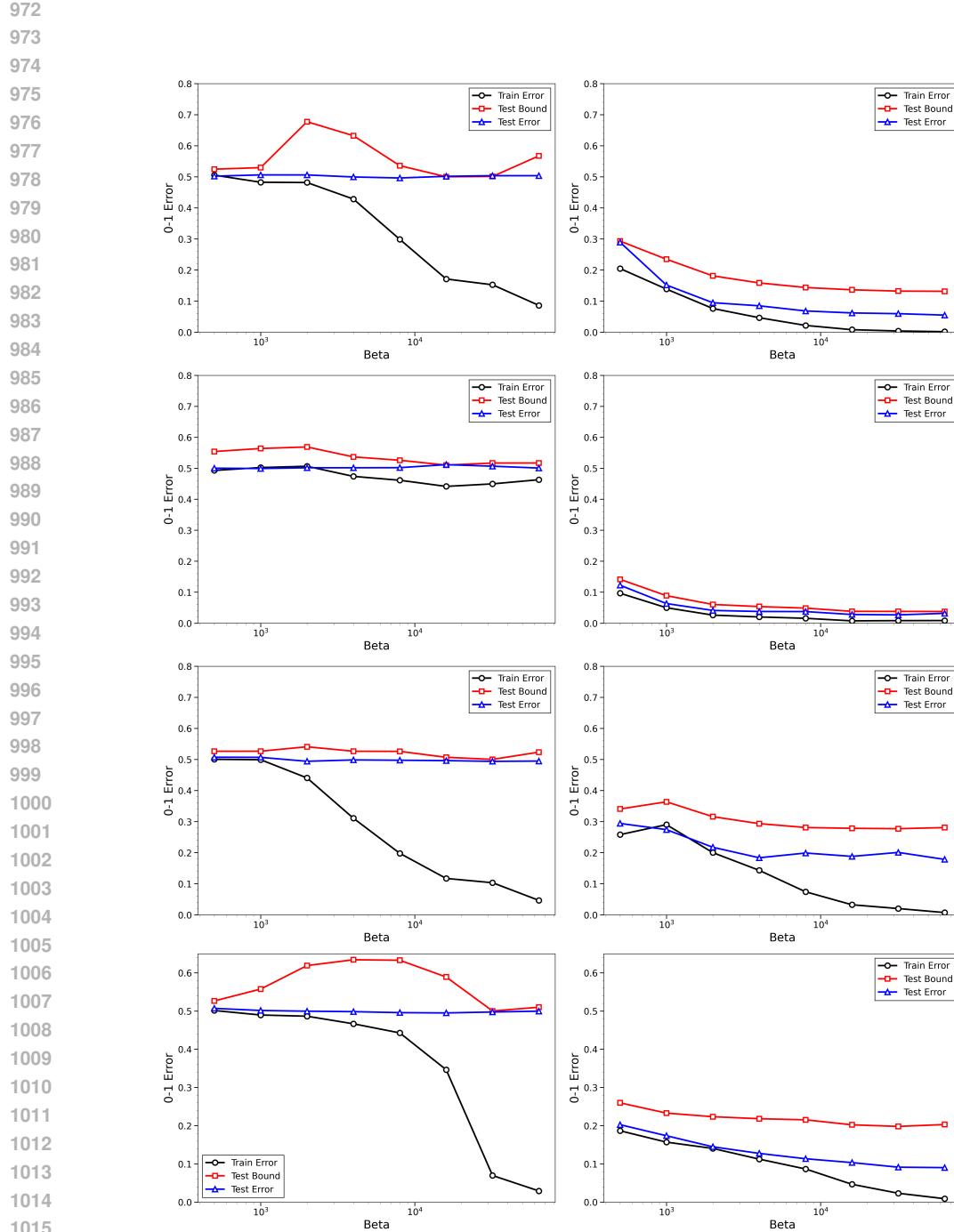


Figure 4: SGLD on MNIST and CIFAR-10 with 8000 training examples using BBCE loss function. The first two rows correspond to MNIST, and the remaining rows to CIFAR-10. Random labels are shown on the left, and correct labels on the right. Both random and true labels are trained using the same algorithm and hyperparameters on a fully connected ReLU network with three hidden layers of 500 (MNIST) or 1000 (CIFAR-10) units, followed by LeNet-5 (MNIST) or VGG-16 (CIFAR-10) shown in the subsequent row. The calibration factors for MNIST are 0.26 and 0.08, for CIFAR-10 0.24 and 0.18. The training error, test error, and our bound for the Gibbs posterior average of the 0-1 loss are plotted against  $\beta$ .

	2HL (W=1000)	3HL (W=500)	LeNet-5
Test Bound at $\beta = 1k$	0.1766	0.2347	0.0887
Test Error at $\beta = 64k$	0.0498	0.0549	0.0317
Test Bound at $\beta = 64k$	0.0860	0.1314	0.0375

(a) MNIST, 8k training examples (true labels).

	2HL (W=1500)	3HL (W=1000)	VGG-16
Test Bound at $\beta = 1k$	0.2905	0.3635	0.2330
Test Error at $\beta = 64k$	0.1719	0.1782	0.0903
Test Bound at $\beta = 64k$	0.2266	0.2807	0.2030

(b) CIFAR-10, 8k training examples (true labels).

Table 1: Test bounds and test errors for different neural network architectures on MNIST and CIFAR-10. The bounds at both low and high temperatures reliably reflect test error performance at low temperature.

#### C.2.4 ULA

We have also conducted experiments using ULA for both datasets. The main difference from SGLD is that we use all the information to compute the gradient at each step. The results are shown in Figure 5.

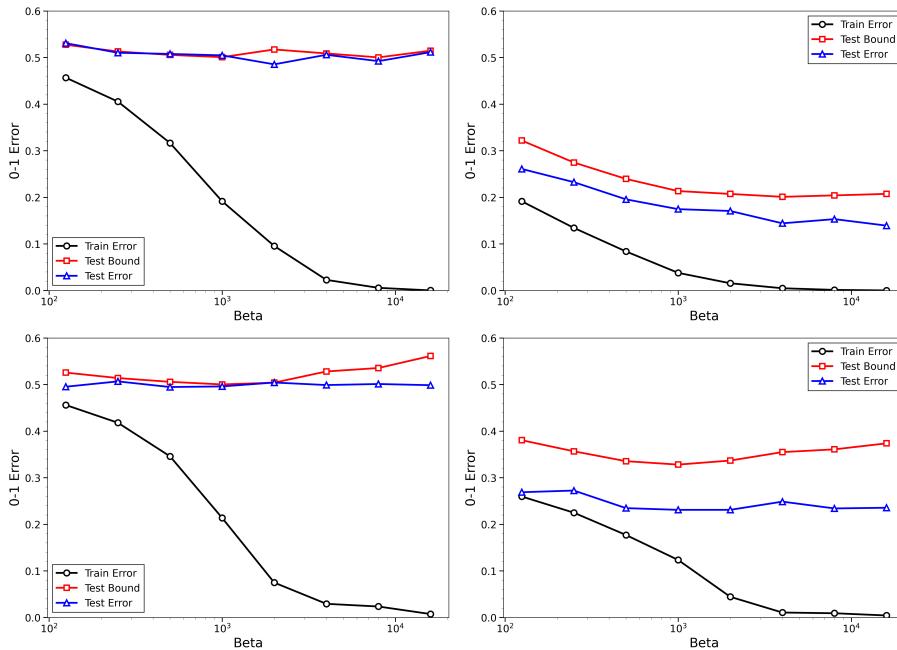
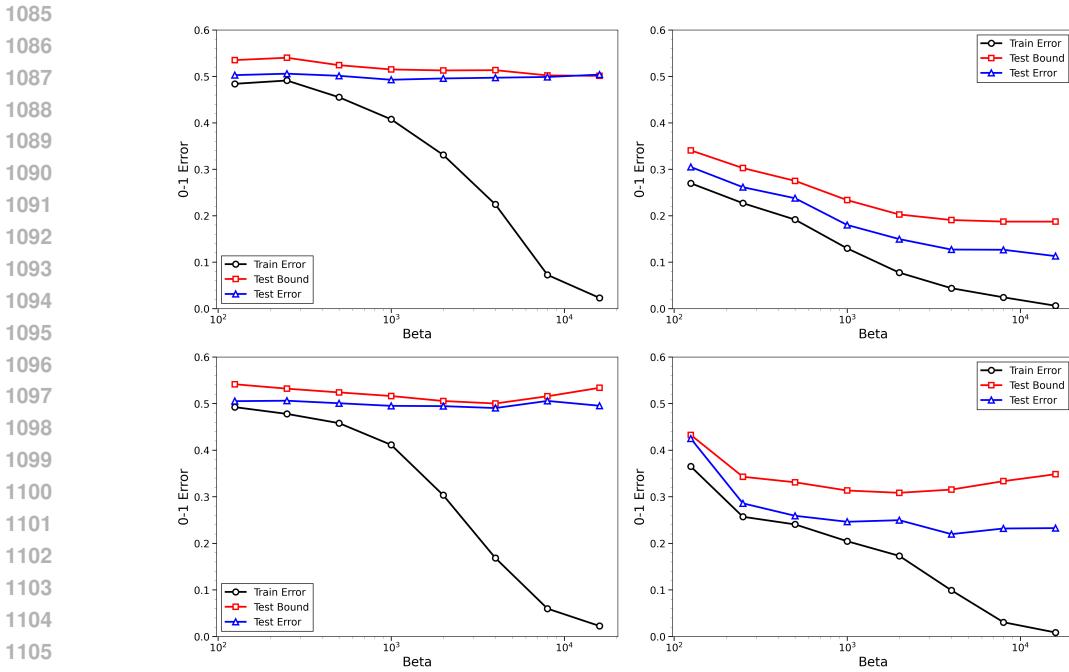


Figure 5: ULA on MNIST and CIFAR-10 with 2000 training examples using BBCE loss function. The first row corresponds to MNIST and the second row to CIFAR-10. Random labels are shown on the left, correct labels on the right. Both random and true labels are trained with the same algorithm and parameters on a fully connected ReLU network with one (respectively two) hidden layers of 500 (respectively 1000) units. The calibration factor for MNIST is 0.49, for CIFAR-10 0.46. Train error, test error and our bound for the Gibbs posterior average of the 0-1 loss are plotted against  $\beta$ .

1080 C.2.5 SAVAGE LOSS FUNCTION  
10811082 We additionally performed experiments using the Savage loss to verify the robustness of our results  
1083 across different loss functions. Following the same setup as in the previous section, the outcomes are  
1084 reported in Figure 7.1107 Figure 6: ULA on MNIST and CIFAR-10 with 2000 training examples using Savage loss function.  
1108 The first row corresponds to MNIST and the second row to CIFAR-10. Random labels are shown on  
1109 the left, correct labels on the right. Both random and true labels are trained with the same algorithm  
1110 and parameters on a fully connected ReLU network with one (respectively two) hidden layers of 500  
1111 (respectively 1000) units. The calibration factor for MNIST is 0.49, for CIFAR-10 0.59. Train error,  
1112 test error and our bound for the Gibbs posterior average of the 0-1 loss are plotted against  $\beta$ .  
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11141115 C.2.6 UNCALIBRATED BOUNDS  
11161117 We show uncalibrated bounds for the MNIST dataset with the BBCE and Savage loss functions under  
1118 the several experimental conditions including setups of Sections C.2.4 and C.2.5. The bounds are  
1119 somewhat looser than the calibrated ones, but still far from trivial. As in all other scenarios the test  
1120 errors are upper bounded correctly.  
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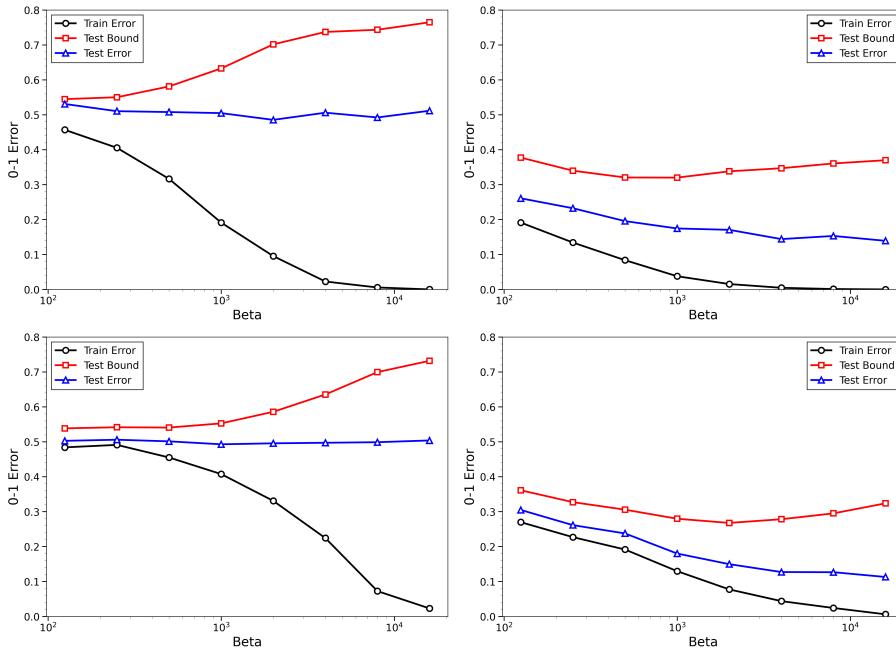


Figure 7: **ULA on MNIST with 2000 training examples using BBCE and Savage loss functions.** The first row corresponds to MNIST with BBCE and the second row to Savage. Random labels are shown on the left, correct labels on the right. Both random and true labels are trained with the same algorithm and parameters on a fully connected ReLU network with one hidden layers of 500 units. Train error, test error and our bound for the Gibbs posterior average of the 0-1 loss are plotted against  $\beta$  without any calibration.

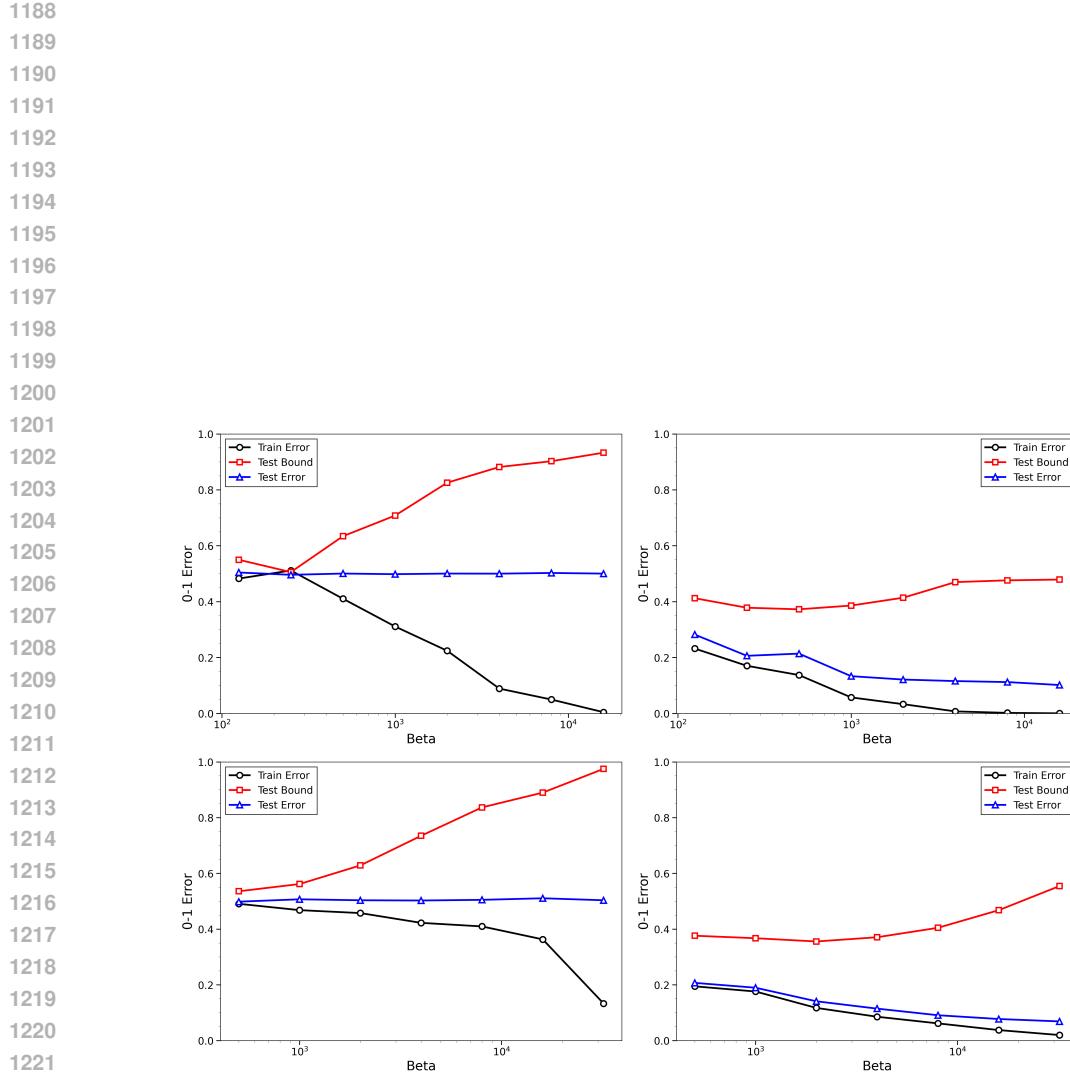
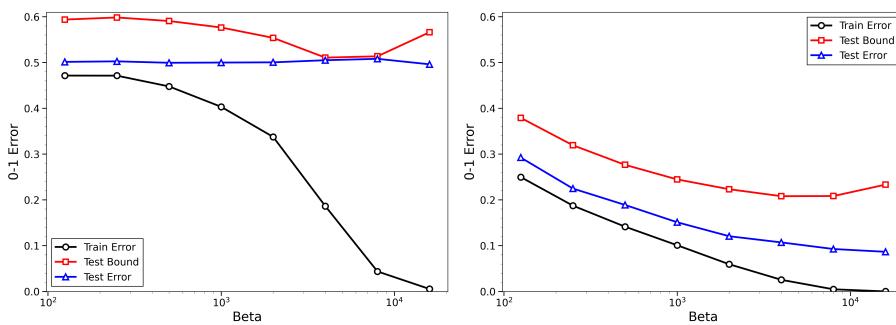


Figure 8: SGLD/ULA on MNIST with 2000/8000 training examples using BBCE/Savage loss functions. The first row corresponds to MNIST with 2000 samples with SGLD and BBCE and the second row to 8000 samples with ULA and Savage. Random labels are shown on the left, correct labels on the right. Both random and true labels are trained with the same algorithm and parameters on a fully connected ReLU network with two hidden layers of 1000 units and one hidden layer of 500 units respectively. Train error, test error and our bound for the Gibbs posterior average of the 0-1 loss are plotted against  $\beta$  without any calibration.

1242 C.2.7 UNBOUNDED LOSS FUNCTION  
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1244 In this section, we use the binary cross-entropy loss to compute the  $\Gamma$  functional. Since binary  
1245 cross-entropy is unbounded, the loss can become very large at high temperatures. To avoid this issue,  
1246 we set the standard deviation of the Gaussian prior to 0.1 in this section. The following plot shows  
1247 the results under the same setup as Section C.2.5, except that we use binary cross-entropy instead of  
1248 the Savage loss.



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Figure 9: ULA on MNIST with 2000 training examples using binary cross entropy loss function. Random labels are shown on the left, correct labels on the right. Both random and true labels are trained with the same algorithm and parameters on a fully connected ReLU network with one hidden layers of 500 units. The calibration factor is 0.34. Train error, test error and our bound for the Gibbs posterior average of the 0-1 loss are plotted against  $\beta$ .

## C.2.8 REAL-WORLD USE CASES

We further evaluated Stochastic Gradient Descent (SGD) to examine the practical relevance of our bounds in real-world interpolation regimes.

Based on our observations, we suggest the following procedure for practitioners who wish to train overparameterized neural networks with standard SGD while also obtaining generalization guarantees. First, randomly permute the labels, train the network at different temperatures, and compute the bound together with the calibration factor. Then, repeat the same procedure using the true labels. At very low temperatures, this approach provides generalization guarantees that may transfer to SGD. The corresponding results are presented in Table 2.

	2HL (W=1000)	3HL (W=500)	LeNet-5
Test Error, SGD	0.0364	0.0363	0.0308
Test Error, SGLD ( $\beta = 64k$ )	0.0498	0.0549	0.0317
Test Bound, SGLD ( $\beta = 64k$ )	0.0860	0.1314	0.0375

(a) MNIST, 8k training examples (true labels).

	2HL (W=1500)	3HL (W=1000)	VGG-16
Test Error, SGD	0.1423	0.1415	0.0933
Test Error, SGLD ( $\beta = 64k$ )	0.1719	0.1782	0.0903
Test Bound, SGLD ( $\beta = 64k$ )	0.2266	0.2807	0.2030

(b) CIFAR-10, 8k training examples (true labels).

Table 2: Comparing SGD test error with SGLD test errors and bounds for different neural network architectures on MNIST and CIFAR-10.