Revisiting minimum description length complexity for overparameterized models

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Classical Wisdom: Occam's razor Use the simplest model that fits the data

U-shaped bias-variance tradeoff: Low-dimensional settings with "good" estimators



Model Complexity

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Model Complexity

Modern Phenomenon: Fit without fear! Use the largest model that achieves zero training error

Non-U shaped risk curves in modern overparameterized models



"Complexity" of \mathcal{H}

..., Skurichina-Duin 98,00, Belkin-Hsu-Ma-Mandal 18, Muthukumar-Vodrahalli-Sahai 19, Hastie-Montanari-Rosset-Tibshirani 19, ...



Is double descent a conundrum for the classical wisdom? We expect the classical U-shaped tradeoff given a fixed dataset, and as the "complexity" of the fitted estimator varies



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We expect the classical U-shaped tradeoff given a fixed dataset, and as the "complexity" of the fitted estimator varies in a good estimator class







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Need to pay attention to

- the estimator class, as well as
- the complexity measure

Is parameter counting a valid complexity measure, especially for $d \gg n$?



Complexity: A tricky concept

A fundamental notion: Kolmogorov's algorithmic complexity Complexity in Statistics and ML: Useful for model selection

- Test error ~ Train error + Complexity / n^a
- x-axis in bias-variance—often vaguely defined; parameter count often used

n = number of samples



Parameter counting as complexity **Origins for linear regression:** $y = X\theta^* + \varepsilon$

- Akaike Information Criterion (AIC): d/2
- Bayesian information criterion (BIC): $\frac{d}{2}\log n$
- Rademacher complexity: $\mathbb{E}\left[\sup \sum \varepsilon_i x_i^{\mathsf{T}}\theta\right] \sim d$ $\theta \in \Theta$
- Degrees of freedom: trace $(X^{T}X) \sim d$
- Vapnik-Chervonenkis dimension: d
- Minimum description length complexity: $\frac{n}{2} \log n$ (asymptotically)

OLS achieves the minimax error of order $\stackrel{a}{-}$ in low-dimensions $d \ll n$ N



but in high-dimensions these complexity measure neither work nor theoretically welljustified

this talk: a data-dependent complexity using minimum description length that is not just parameter count

Minimum Description Length (MDL) "Choose the model that gives the shortest description of data"

- Developed by Rissanen with roots in Kolmogorov's algorithmic complexity, also seen as a computable variant based on Shannon's information theory
- Probability models interpreted as codes: A probability model Q on $\mathscr{Y} \longleftrightarrow$ Encoding observation y with $\log(\frac{1}{Q(y)})$ bits
 - Good fit \leftrightarrow Shorter codelength (description)
- Over the years: Two-stage MDL, mixture MDL, normalized maximum likelihood

Rissanen 76, 80, Barron-Rissanen-Yu 98, Hansen-Yu 02, Grunwald 07



Optimal codes from an MDL perspective

With correctly specified generative model

Two possible objectives

Minimum expected redundancy

$$\min_{q} \mathbb{E}_{y \sim p^{\star}} \left[\log \left(\frac{1}{q(y)} \right) - \log \left(\frac{1}{p^{\star}(y)} \right) \right]$$

Minimum worst-case redundancy

$$\min_{q} \max_{y} \left[\log \left(\frac{1}{q(y)} \right) - \log \left(\frac{1}{p^{\star}(y)} \right) \right]$$

Optimal code $q = p^2$

With unspecified generative model

One objective can be generalized

Worst-case redundancy w.r.t. a postulated class of codes $\{p_{\theta}, \theta \in \Theta\}$

$$\min_{q} \max_{y} \left[\log\left(\frac{1}{q(y)}\right) - \min_{\theta} \log\left(\frac{1}{p_{\theta}(y)}\right) \right]$$

Optimal code: Normalized maximum likelihood (NML)

$$q_{NML}(y) = \frac{\max_{\theta} p_{\theta}(y)}{\int \max_{\theta'} p_{\theta'}(z) dz}$$





- = Expected redundancy under known P^{\star}
- $\sim \frac{d}{2} \log n$ with *d*-dimensional parametric codes ($d \ll n$)
- E.g., even for the linear model $y = X\theta^* + \varepsilon$ with Gaussian noise & linear codes:

$$\propto \int \exp\left(-\frac{1}{2\sigma^2} \|X\hat{\theta}_{OLS} - y\|^2\right) dy = \infty.$$

 $\sigma^2 = \text{noise} (\varepsilon) \text{ variance}$



This talk: Tackling the infinity problem of NML

- Prior fixes: Truncate the output space [Barron-Rissanen-Yu 98]
- <u>This talk</u>: Regularization + Modified NML complexity
 - In particular, using ridge regularization as that allows to obtain best prediction performance across range of models and also enable analytical calculations

Ridge luckiness normalized maximum likelihood Weight the codes with a luckiness function on parameter space

• LNML principle: $\max_{\theta} p_{\theta}(y) \leftrightarrow \max_{\theta} p_{\theta}(y) w_{\theta}$ for some ``luckiness function" w_{θ}

- For linear models, each $w_{\theta,\Lambda}$ leads to a modified LNML code q_{Λ} : $q_{\Lambda}(y) \propto \exp\left(-\frac{1}{2\sigma^2}\right)$

with
$$\hat{\theta}_{\Lambda} = \min_{\theta} \|X\theta - \theta\|$$

• Our approach: Choose luckiness factors $w_{\theta,\Lambda}$ induced by ridge regularization

$$\frac{1}{2} \|X\widehat{\theta}_{\Lambda} - y\|^2 - \frac{1}{2\sigma^2} \widehat{\theta}_{\Lambda}^{\mathsf{T}} \Lambda \widehat{\theta}_{\Lambda} \right)$$

 $-y\|^{2} + \theta^{\mathsf{T}} \Lambda \theta = (X^{\mathsf{T}} X + \Lambda)^{-1} X^{\mathsf{T}} y$

 σ^2 = noise variance



Defining the MDL-Complexity Via the optimal LNML code in a rich ridge class

- To derive complexity: Optimize over $\Lambda-$
- Choose a rich class of Λ : { $UDU^{\top}, D \geq$
- Account codelength for Λ (not present in usual NML):

$$\mathscr{L}(\Lambda) = \sum \log(\lambda_i / \Delta)$$
 for

Define the MDL-complexity as $MDL - COMP = -(R_{opt} + \mathscr{L}(\Lambda_{opt})) \text{ where } \Lambda_{opt} \text{ achieves } R_{opt}$

$$--\underset{\Lambda}{\min} \mathbb{E}_{y \sim p^{\star}} \left[\log \left(\frac{1}{q_{\Lambda}(y)} \right) - \log \left(\frac{1}{p^{\star}(y)} \right) \right] =: R_{op}$$

$$= 0 \} \text{ with } U = \text{eigenvectors}(X^{\top}X)$$

or small enough (discretization) Δ



Main result: Analytical MDL-COMP for linear models

Not just parameter count, instead a function of covariate design & its interaction with signal

If $y \sim \mathcal{N}(X\theta^{\star}, \sigma^2 I_n)$, and $X^{\top}X = U \text{diag}(\rho_1, \dots, \rho_d) U^{\top}$, $w_i = U^{\top}\theta^{\star}$, then









 d_{\star} = true dimensionality α = eigenvalue decay rate



Other favorable properties about MDL-COMP

 $\min_{\Lambda} \max_{P \in \mathscr{P}} \mathbb{E}_{y \sim P} \log\left(\frac{1}{q_{\Lambda}(y)}\right) \text{ with } \mathscr{P} = \{P \mid E_{P}(y \mid X) = X\theta^{\star}, \operatorname{Var}(y \mid X) \leq \sigma^{2} I_{n}\}$

Also, MDL-COMP can be easily extended to kernel methods, where it informs minimax in-sample risk

The optimal regularization parameter defining linear MDL-COMP also achieves • optimal regularization for the in-sample risk min $\mathbb{E}\left[\sum_{i=1}^{n} (x_i^{\mathsf{T}}\hat{\theta}_{\Lambda} - x_i^{\mathsf{T}}\theta^{\star})^2\right]$ best worst-case redundancy over a family of noise distributions



Consequences for double descent Perhaps the issue lies in the estimator

- Since MDL-COMP is monotone in d, using it as the complexity does not change the qualitative nature of the test MSE curves for OLS or ridge
- Double descent likely due to the choice of the estimator, e.g., min-norm OLS
- Conclusion not contradictory with literature on benign overfitting, which provide sufficient conditions for interpolation to generalize well for $d \gg n$ (often estimator and dataset vary together with d/n)

Tsigler-Bartlett 20, Wu-Xu 20, Nakkiran-Venkat-Kakade-Ma 20 ...

... Belkin-Hsu-Ma-Mandal 18, Muthukumar-Vodrahalli-Sahai 19, Hastie-Montanari-Rosset-Tibshirani 19,



Can MDL-COMP be useful for practice?



where

 $\hat{\theta}_{\lambda} = (X^{\mathsf{T}}X + \lambda I)^{-1}X^{\mathsf{T}}y$ and ρ_i denote the eigenvalues of $X^{\mathsf{T}}X$

Model selection with Prac-MDL-COMP



Prac-MDL-COMP Objective

 2×10^{0}

Test MSE minimizer close to the minimizer of Prac-MDL-COMP objective



Model selection with Prac-MDL-COMP



Prac-MDL-COMP removes the double descent Test performance competitive compared to cross-validation







Using Prac-MDL-COMP for hyperparameter tuning $\min_{\lambda} \left[\frac{\|X\hat{\theta}_{\lambda} - y\|^2}{2\sigma^2} + \frac{\lambda \|\hat{\theta}_{\lambda}\|}{2\sigma^2} \right]$

K-fold computational savings compared to K-fold cross validation (CV)

$$\frac{\|^2}{2} + \sum_{i=1}^{\min\{n,d\}} \log\left(1 + \frac{\rho_i}{\lambda}\right)$$



Experiments on PMLB datasets

Diverse set of tabular datasets

Predicting breast cancer from image features

Predicting automobile prices

Election results from previous elections

PMLB: a large benchmark suite for machine learning evaluation and comparison Olson-Cava-Orzechowski-Urbanowicz-Moore 17



Experiments on PMLB datasets MDL-COMP better for hyper-parameter tuning in low-data settings



fMRI experimental setup





Extract gabor Video clip features

Nishimoto-Vu-Naselaris-Benjamini-Yu-Gallant 11



d = 1280*n_train* = 7200 $n_test=540$



Experiments on fMRI data from 100 voxels MDL-COMP better than Bayesian-ARD regression, and pretty comparable to CV tuning





Experiments on neural tangent kernels

(2 layer RELU neural tangent kernel)



Once again, MDL-COMP pretty comparable to CV tuning

Summary MDL-COMP—a modified NML complexity measure using optimal ridge estimators

- Not just parameter count— $\log d$ scaling for $d \gg n$ with Gaussian covariates
- Hints that double descent likely due to choice of estimator
- Provides competitive-to-CV but computationally-better hyper-parameter tuning
- Open questions:

- Analytical relations between MDL-COMP and out-of-sample generalization?
- MDL-COMP for classification + complex models like neural networks?



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Additional slides

Bias-variance tradeoff: Few things to note..

- We should expect a tradeoff given
 - some fixed data
 - as the "complexity" of the fitted estimator changes
- Do not expect a tradeoff for
 - poor choice of estimators
 - poor choice of complexity



MDL-COMP for kernel methods

Universal codes induced by kernel ridge regression

- Define the code Q_{λ} : $q_{\lambda}(y) \propto \exp\left(-\frac{1}{2\sigma^2}\right)$ where $\widehat{\theta}_{\lambda} = \min_{\theta} ||K\theta - y_{\theta}|$
- This choice comes from kernel ridge regression:



$$\|K\widehat{\theta}_{\lambda} - y\|^2 - \frac{\lambda}{2\sigma^2}\widehat{\theta}_{\lambda}^{\mathsf{T}}K\widehat{\theta}_{\lambda}\right)$$

$$y\|^2 + \lambda\theta^\top K\theta = (K + \lambda I)^{-1}y$$

$$y_i)^2 + \lambda \|f\|_{\mathcal{H}}^2$$

Kernel ridge regression

One can show that for the optimization problem



it suffices to consider the functions of the form

$$f = \sum_{i=1}^{n} \theta_i K(x_i, \cdot),$$

$$y_i)^2 + \lambda \|f\|_{\mathscr{H}}^2,$$

and this leads to the kernel ridge regression problem in the previous slide

MDL-COMP for kernel regression

• Let ρ_i denote the eigenvalues of the kernel matrix $(K(x_i, x_i))_{i,i=1}^n$ and suppose $y \sim \mathcal{N}(f^{\star}(X), \sigma^2 I_n)$ for some f^{\star} in RKHS of K, then

$$\mathcal{R}_{opt} \leq \frac{1}{2n} \left[\min_{\substack{\lambda}} \frac{\lambda \| f^{\star} \|_{\mathcal{H}}^2}{\sigma^2} \right]$$

(no easy closed-form)

Since there is only a single hyper-parameter, we can directly take

 $MDL - COMP = \mathcal{R}_{opt}$

$$+\sum_{i=1}^{n} \log\left(1+\frac{\rho_i}{\lambda}\right)\right]$$

Unpacking MDL-COMP for Sobolev kernels

and one can derive



• For Sobolev kernel of smoothness α , the eigenvalues decay like $\rho_i \sim i^{-2\alpha}$,

Neural tangent kernels (NTK)

NTK approximates neural net with infinite width

Varies with number of layers and nonlinearity

$$K(x, x') = \mathbb{E}_{\theta \sim W} \left[\left\langle \frac{\partial f(\theta, x)}{\partial \theta}, \frac{\partial f(\theta, x)}{\partial \theta} \right\rangle \right]$$

- Analytical expressions for simple architectures (e.g., cosine kernel for 2 layer Relu networks)
- Software libraries for computing the kernel for deeper networks

Jacot et al. 2018

 (θ, x')

Kernel version of the computation Prac-MDL-COMP = $\min_{\lambda} \log\left(\frac{1}{q_{\lambda}(y)}\right)$ $= \min_{\lambda} \left[\frac{\|K\hat{\theta}_{\lambda} - y\|^2}{2\sigma^2} + \frac{\lambda\hat{\theta}_{\lambda}^{\mathsf{T}}K\hat{\theta}_{\lambda}}{2\sigma^2} + \sum_{i=1}^n \log\left(1 + \frac{\rho_i}{\lambda}\right) \right]$

where

$$\widehat{\theta}_{\lambda} = (K + \lambda I)^{-1} y \text{ and } \rho_i \operatorname{der}$$



note the eigenvalues of the kernel matrix K

Proofs

Proof sketch for linear models

$$\mathcal{D}_{\mathrm{KL}}(\mathbb{P}_{\theta_{\star}} \| \mathbb{Q}_{\Lambda}) = \mathbb{E}_{\mathbf{y}} \left[\log \frac{p(\mathbf{y}; \mathbf{X}, \theta_{\star})}{q_{\Lambda}(\mathbf{y})} \right]$$
$$= \mathbb{E}_{\mathbf{y}} \left[\log \left(\frac{\frac{1}{(2\pi\sigma^{2})^{n/2}} \exp\left(-\frac{1}{2\sigma^{2}} \|\mathbf{y} - \mathbf{X}\theta_{\star}\|^{2}\right)}{\frac{1}{C_{\Lambda}(2\pi\sigma^{2})^{n/2}} \exp\left(-\frac{1}{2\sigma^{2}} \|\mathbf{y} - \mathbf{X}\widehat{\theta}\|^{2} - \frac{1}{2\sigma^{2}}\widehat{\theta}^{\top}\Lambda\widehat{\theta}\right)} \right) \right]$$
$$(31) \qquad = -\underbrace{\mathbb{E}_{\mathbf{y}} \left[\frac{1}{2\sigma^{2}} \|\mathbf{y} - \mathbf{X}\theta_{\star}\|^{2} \right]}_{=:T_{1}} + \underbrace{\mathbb{E} \left[\frac{1}{2\sigma^{2}} \|\mathbf{y} - \mathbf{X}\widehat{\theta}\|^{2} + \frac{1}{2\sigma^{2}}\widehat{\theta}^{\top}\Lambda\widehat{\theta} \right]}_{=:T_{3}} + \underbrace{\log C_{\Lambda}}_{=:T_{3}}$$



(33a)
$$T_{2} = \frac{(n - \min\{n, d\})}{2} + \frac{1}{2} \sum_{i=1}^{\min\{n, d\}} \frac{(\rho_{i} w_{i}^{2} / \sigma^{2} + 1)\lambda_{i}}{\lambda_{i} + \rho_{i}}, \text{ and}$$
(33b)
$$T_{3} = \frac{1}{2} \sum_{i=1}^{\min\{n, d\}} \log\left(\frac{\rho_{i} + \lambda_{i}}{\lambda_{i}}\right)$$

$$\frac{1}{n}\mathcal{D}_{\mathrm{KL}}(\mathbb{P}_{\theta_{\star}} \parallel \mathbb{Q}_{\Lambda}) = T_{1} + T_{2} + T_{3}$$

$$(34) \qquad \qquad = -\frac{\min\{n,d\}}{2n} + \frac{1}{2n} \sum_{i=1}^{\min\{n,d\}} \underbrace{\left(\frac{(\rho_{i}w_{i}^{2}/\sigma^{2}+1)\lambda_{i}}{\lambda_{i}+\rho_{i}} + \log\left(\frac{\rho_{i}+\lambda_{i}}{\lambda_{i}}\right)\right)}_{=:f_{i}(\lambda_{i})}.$$

Finally to compute the \mathcal{R}_{opt} (32), we need to minimize the KL-divergence (34) where we note the objective depends merely on $\lambda_1, \ldots, \lambda_{\min\{n,d\}}$. We note that the objective (RHS of equation (34)) is separable in each term λ_i . We have

(35)
$$f'_i(\lambda_i) = 0 \quad \iff \quad -\frac{(\rho_i w_i^2 / \sigma^2 + 1)}{(1 + \rho_i / \lambda_i)^2} + \frac{1}{1 + \rho_i / \lambda_i} = 0 \quad \iff \quad \lambda_i^{\text{opt}} = \frac{\sigma^2}{w_i^2}.$$

Proof sketch for the result with Gaussian X

- When $X \in \mathbb{R}^{n \times d}$ has i.i.d. $\mathcal{N}(0, 1/n)$ entries, then for $X^{\top}X = U \operatorname{diag}(\rho_1, \dots, \rho_d) U^{\top}$

• The matrix U has uniform distribution over the set of $d \times d$ orthonormal matrices and hence for any fixed θ^* , the coordinates of $w = U^{\mathsf{T}} \theta^*$ are identically distributed, and we can use the approximation $w_i^2 \approx \frac{\|\theta^{\star}\|^2}{d}$

Proof sketch for the result with Gaussian X

• When $X \in \mathbb{R}^{n \times d}$ has i.i.d. $\mathcal{N}(0, 1/n)$ entries, then for $X^{\mathsf{T}}X = U \operatorname{diag}(\rho_1, \dots, \rho_d) U^{\mathsf{T}}$

- $d \ll n$, $X^{\mathsf{T}}X \approx I_d$, $\rho_i \approx 1$ $d > n, \quad X^{\mathsf{T}}X \approx \begin{bmatrix} \frac{d}{n}I_n & 0\\ 0 & 0 \end{bmatrix}, \quad \rho_i$ U

Marcenko-Pastur 67, Silverstein 95, Tulino-Verdu 04

• The eigenvalues ρ_i follow Marcenko-Pastur Law with the following approximation

$$\begin{cases} \approx \frac{d}{n}, & i \le n \\ = 0, & i > n \end{cases}$$

Two-stage MDL

wo-stage MDL

codelength for any fixed p_A

$$\log\left(\frac{1}{p_{\theta}(y)}\right)$$

- But the choice of $\hat{\theta}$ varies with y, so need to account for the codelength needed to transmit the value of θ

Consider a parametric class of codes $\{p_{\theta}, \theta \in \Theta\}$, and then use the valid

Minimizing this codelength is same as MLE over the given parametric class

Two-stage MDL

Thus the overall codelength is

$$\log\left(\frac{1}{p_{\hat{\theta}}(y)}\right) + \frac{d}{2}\log n$$

Codelength for data Codelength for d-dimensional parameter upto $1/\sqrt{n}$ resolution

For a fixed parametric class, same as MLE (since the second term is constant) • For a family of parametric classes, same as BIC procedure (model selection)

MDL-COMP vs Cross-validation

• For $n \times d$ covariates, for each value of λ , the computational costs are

• **Prac-MDL-COMP**: $1 \times \text{SVD solver} = nd^2 + n^2d$

Prac-MDL-COMP provides a proxy for complexity and saves K-fold computation!

• K-fold cross-validation: $K \times OLS$ solver = $K \times (nd^2 + \min(n^3, d^3))$

Issues with NML

Issues with NML: Linear mode

• Then Q_{NML} is given by

 $q_{NML}(y) \propto \max_{\theta} p_{\theta}(y) = p_{\hat{\theta}}(y)$

 $\hat{\theta} = \arg \max p_{\theta}(y) = \arg p_{\theta}(y)$

(We can use min-norm OLS when d > n)

$$= \frac{1}{(2\pi\sigma^2)^{n/2}} \exp\left(-\frac{1}{2\sigma^2} \|X\widehat{\theta} - y\|^2\right)$$

$$\min_{\theta} \|X\theta - y\|^2 = \widehat{\theta}_{OLS}$$

Issues with NML: Linear model

- If *Y* is not compact (even when d<n) $\int \frac{1}{(2\pi\sigma^2)^{n/2}} \exp\left(-\frac{1}{2\sigma^2}\|X\right)$
- Easiest to s

See when
$$d > n$$
 so that $X\hat{\theta} = y$, and we have

$$\int \frac{1}{(2\pi\sigma^2)^{n/2}} \exp\left(-\frac{1}{2\sigma^2} \|X\hat{\theta} - y\|^2\right) dy = \int_{\mathbb{R}^n} \frac{1}{(2\pi\sigma^2)^{n/2}} dy = \infty$$

$$(\widehat{\theta} - y \|^2) dy = \infty$$

Grunwald 07

Optimal code: With known true model P^{\star} is P^{\star}

- When $y \sim P^*$, the expected code-length when using code Q is given by $\mathbb{E}_{y \sim P^*} \log \left(\frac{1}{Q(y)}\right) = \mathbb{KL}(P^* || Q) + H(P^*)$
- Minimized when $Q = P^{\star}$, since redundancy is non-negative
- P^{\star} also minimizes the worst-case regret

$$p^{\star} = \underset{q}{\arg\min} \max_{y} \left[\log\left(\frac{1}{q(y)}\right) - \log\left(\frac{1}{p^{\star}(y)}\right) \right]$$
 such that $\int q(z)dz \le 1$

Expressions

Unpacking the result for Gaussian X Slow logarithmic growth in overparameterized regime ($d \gg n$)

• When $X \in \mathbb{R}^{n \times d}$ has i.i.d. $\mathcal{N}(0, 1/n)$ entries, then

$$\mathsf{MDL-COMP} \approx \begin{cases} \frac{d}{n} \log\left(1 + \frac{d_{\star}}{r^2}\right) + \frac{d}{n} \\ \frac{d}{n} \log\left(1 + \frac{d}{r^2}\right) + \frac{d}{n} \\ \log\left(\frac{d}{n} + \frac{d}{r^2}\right) + \log r^2 \end{cases}$$

 \tilde{X} denotes the first d_{\star} columns of X; and $r^2 = ||\theta^{\star}||^2$]

- $\frac{d}{d}\log\left(\frac{1}{\Delta}\right), \quad \text{if } d \in [1, d_{\star}]$ $\frac{1}{\Delta}\log\left(\frac{1}{\Delta}\right), \quad \text{if } d \in [d_{\star}, n]$ $\left(\frac{1}{\Delta}\right)$, if $d \in [n, \infty)$
- [here d_{\star} denotes the true dimensionality of θ^{\star} , and we assume $\mathbb{E}[y|X] = \tilde{X}\theta^{\star}$ where

MDL-COMP scaling for other designs

