

# The Bias-Variance Frontier of Risk Estimation: When Spectral Methods Dominate Monte Carlo

Formal proofs and numerical evidence for the MVUE characterization of spectral Expected Shortfall

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## Overview

Every bank and regulator computing Expected Shortfall (ES) faces a choice: use the raw data (spectral method) or fit a model and simulate (Monte Carlo). The standard advice — “more computation is better” — is wrong for small samples and right for large ones, but the boundary between the two regimes has not been formally characterized.

We prove that spectral ES is the **minimum-variance unbiased estimator** (MVUE) among all model-free ES estimators. This means no unbiased method can beat it on variance. However, Monte Carlo methods that fit a parametric model achieve lower variance by introducing controlled bias — they regularize the tail. For typical regulatory backtesting windows (250 trading days), this regularization effect dominates, and parametric MC produces lower mean squared error.

The paper characterizes the **crossover point**: the sample size at which spectral methods begin to dominate. Below the crossover, parametric MC wins on MSE. Above it, spectral wins — and the gap grows without bound, because model bias does not shrink with more data.

- **For regulators:** spectral ES is the right choice. It carries zero model risk and its estimation error is purely random (diversifiable over time).
- **For banks optimizing internal models:** parametric MC may reduce short-term volatility of risk estimates, but at the cost of systematic model-dependent bias that regulators cannot verify.
- **For researchers:** the bias-variance Pareto frontier of ES estimation is formally characterized for the first time, with 168 machine-verified theorems and zero axioms. A companion paper (Nagy, 2026b) develops the estimation-theoretic foundations: Cramér-Rao bounds, minimax rates, and a phase transition framework.

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## Abstract

We study the bias-variance trade-off in Expected Shortfall estimation, comparing spectral (order-statistic) methods with parametric and bootstrap Monte Carlo. We prove that spectral ES is the minimum-variance unbiased estimator (MVUE) in the class of model-free risk estimators and characterize the Pareto frontier between bias and variance. Parametric Monte Carlo achieves lower

variance through regularization but introduces irreducible model bias that does not diminish with sample size. We derive the crossover condition: spectral methods dominate when the variance gap between methods falls below the squared model bias, which occurs at sample sizes of approximately 500–1000 for heavy-tailed distributions. The characterization extends to all coherent, law-invariant risk measures via Kusuoka’s representation theorem. All results are formally verified (889 verified declarations, 168 theorems, 0 axioms) and supported by Monte Carlo experiments on  $t(3)$  portfolios. The findings imply that regulatory backtesting at the Basel III standard window ( $n = 250$ ) operates in the Monte Carlo regime, while stress testing and long-horizon risk management benefit from spectral methods. A companion paper (Nagy, 2026b) develops the structural estimation-theoretic foundations: Cramér-Rao efficiency, minimax sample complexity, a model risk diagnostic, and phase transition characterization.

**Keywords:** Expected Shortfall, spectral risk measures, bias-variance trade-off, MVUE, Monte Carlo, model risk, Kusuoka representation, formal verification

## 1. Introduction

### 1.1 The Problem

Expected Shortfall at level  $\alpha$  is the average loss beyond the  $\alpha$ -quantile:

$$\text{ES}_\alpha(X) = \frac{1}{1-\alpha} \int_\alpha^1 \text{VaR}_u(X) du.$$

Two estimation strategies compete:

- **Spectral (order-statistic):** Sort the  $n$  observed losses, take the mean of the top  $(1-\alpha)n$  observations. This is a direct plug-in estimator requiring no distributional assumption.
- **Parametric Monte Carlo:** Fit a parametric distribution (e.g.,  $t$ -distribution) to the data, simulate  $M$  paths, compute ES on each simulated sample, and average. This smooths the tail estimate via the fitted model.

The literature overwhelmingly treats spectral estimation as a “simple” baseline and Monte Carlo as a “sophisticated” alternative. We show this framing is backwards for large samples and correct for small ones — and we characterize the boundary precisely.

### 1.2 Main Result

**Theorem (Bias-Variance Pareto Characterization).** *Let  $\hat{\theta}_{SF}$  denote the spectral ES estimator and  $\hat{\theta}_{MC}$  a parametric Monte Carlo estimator. Then:*

1.  $\hat{\theta}_{SF}$  is unbiased:  $\text{MSE}(\hat{\theta}_{SF}) = \text{Var}(\hat{\theta}_{SF})$ .
2.  $\hat{\theta}_{MC}$  has lower variance:  $\text{Var}(\hat{\theta}_{MC}) < \text{Var}(\hat{\theta}_{SF})$  (regularization effect).
3.  $\hat{\theta}_{MC}$  has positive, irreducible model bias:  $\text{bias}^2(\hat{\theta}_{MC}) > 0$  even as  $n \rightarrow \infty$ .
4. Spectral dominates in MSE if and only if  $\text{Var}(\hat{\theta}_{SF}) - \text{Var}(\hat{\theta}_{MC}) < \text{bias}^2(\hat{\theta}_{MC})$ .
5. This condition is eventually satisfied for all  $n > n^*$ , where  $n^* = \sigma_{\text{gap}}^2 / \text{bias}_{\text{model}}^2$ .

[Formal: spectral\_wins\_iff\_bias\_exceeds\_gap, crossover\_spectral\_wins, asymptotic\_spectral\_dominance in the Platonic kernel, domain noise\_free\_backtest]

### 1.3 Proof Strategy

The argument has three steps:

1. **Bias-variance decomposition** (§3):  $\text{MSE} = \text{bias}^2 + \text{variance}$  for any estimator. Spectral has zero bias; parametric MC trades bias for variance reduction.
2. **Model risk characterization** (§4): The model bias has an irreducible component (model misspecification) that does not shrink with  $n$ , while both variances shrink as  $O(1/n)$  under CLT. Therefore the variance gap vanishes but the bias cost persists.
3. **Regime characterization** (§5): Below the crossover  $n^*$ , the variance gap exceeds the bias cost (MC wins). Above  $n^*$ , the bias cost exceeds the variance gap (spectral wins). The crossover depends on tail heaviness, risk level  $\alpha$ , and model quality.

### 1.4 Comparison with Prior Work

Aspect	Acerbi (2002, 2014)	This paper
ES computation	Spectral representation	Same, plus MVUE characterization
MC comparison	Not addressed	Full bias-variance Pareto frontier
Model risk	Not formalized	Irreducible bias theorem
Regime boundary	None	Crossover $n^*$ characterized
Scope	ES only	All coherent risk measures (Kusuoka)
Structural limits	None	CR bound, minimax rate, phase transition (companion paper)
Verification	None	168 theorems, 0 axioms

### 1.5 What This Paper Does Not Claim

- We do not claim spectral ES is always superior. For  $n < n^*$ , parametric MC has lower MSE.
- We do not address estimation of  $\alpha$  itself (the quantile level is assumed known).
- We do not model transaction costs, liquidity, or other market frictions.
- The formal proofs operate in the Platonic proof kernel (Python-based), not in Lean 4.

### 1.6 Organization

Section 2 defines notation. Section 3 develops the bias-variance framework. Section 4 treats model risk. Section 5 characterizes the sample-size regimes. Section 6 extends to all coherent risk measures. Section 7 presents numerical verification. Section 8 discusses regulatory implications. Section 9 provides the proof architecture.

## 2. Setup and Notation

Let  $X_1, \dots, X_n$  be i.i.d. losses from distribution  $F$  with finite second moment. Let  $X_{(1)} \leq \dots \leq X_{(n)}$  denote the order statistics.

**Spectral ES estimator:**

$$\hat{\theta}_{\text{SF}} = \frac{1}{\lfloor (1-\alpha)n \rfloor} \sum_{i=\lceil \alpha n \rceil}^n X_{(i)}.$$

**Parametric MC estimator:** Fit parameters  $\hat{\eta} = \hat{\eta}(X_1, \dots, X_n)$  of a parametric family  $G_{\eta}$ . Simulate  $M$  samples of size  $n$  from  $G_{\hat{\eta}}$ , compute spectral ES on each, and average:

$$\hat{\theta}_{\text{MC}} = \frac{1}{M} \sum_{j=1}^M \hat{\theta}_{\text{SF}}(Y^{(j)}), \quad Y^{(j)} \sim G_{\hat{\eta}}.$$

**Bootstrap MC estimator:** Resample with replacement from the observed data:

$$\hat{\theta}_{\text{BMC}} = \frac{1}{M} \sum_{j=1}^M \hat{\theta}_{\text{SF}}(Z^{(j)}), \quad Z^{(j)} = \text{bootstrap}(X_1, \dots, X_n).$$

**Mean Squared Error decomposition:**

$$\text{MSE}(\hat{\theta}) = \text{bias}^2(\hat{\theta}) + \text{Var}(\hat{\theta}),$$

where  $\text{bias}(\hat{\theta}) = \mathbb{E}[\hat{\theta}] - \theta_{\text{true}}$ .

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## 3. The Bias-Variance Frontier

### 3.1 Spectral ES Is Unbiased

The spectral estimator is a plug-in estimator for the tail expectation. Under the finite-variance assumption,  $\mathbb{E}[\hat{\theta}_{\text{SF}}] = \text{ES}_{\alpha}(F)$ , so:

$$\text{MSE}(\hat{\theta}_{\text{SF}}) = \text{Var}(\hat{\theta}_{\text{SF}}).$$

This is the MVUE property: among all unbiased estimators of  $\text{ES}_{\alpha}$  that use only the order statistics, spectral ES achieves minimum variance. No unbiased model-free estimator can do better.

[Formal: spectral\_mse\_is\_variance, spectral\_is\_mvue]

## 3.2 Monte Carlo Regularization

Parametric MC introduces bias through two channels:

1. **Estimation bias**  $b_{\text{est}}$ : from finite-sample parameter estimation. Vanishes as  $n \rightarrow \infty$  (MLE consistency).
2. **Model bias**  $b_{\text{model}}$ : from distributional misspecification. Does **not** vanish with  $n$ .

$$\text{bias}(\hat{\theta}_{\text{MC}}) = b_{\text{est}} + b_{\text{model}}, \quad b_{\text{model}} = |\text{ES}_\alpha(G_{\eta^*}) - \text{ES}_\alpha(F)|$$

where  $\eta^* = \arg \min_\eta D_{\text{KL}}(F \| G_\eta)$  is the best-fit parameter.

The variance reduction comes from averaging over  $M$  simulated samples, each of which smooths the tail through the parametric model. The model acts as a regularizer: it constrains the tail shape, reducing variance at the cost of introducing the structural bias  $b_{\text{model}}$ .

[Formal: mc\_mse\_has\_bias\_cost, mc\_variance\_benefit, bias\_floor, misspecification\_means\_bias]

## 3.3 The Pareto Frontier

No estimator can simultaneously achieve zero bias and the variance of parametric MC. The trade-off is strict:

- Spectral sits at  $(0, \sigma_{\text{SF}}^2)$  on the (bias<sup>2</sup>, variance) plane — zero bias, higher variance.
- Parametric MC sits at  $(b_{\text{model}}^2, \sigma_{\text{MC}}^2)$  — positive bias, lower variance.

Both are Pareto-optimal: spectral among unbiased estimators, MC among biased ones of comparable variance.

[Formal: strict\_tradeoff, spectral\_pareto\_optimal, mc\_pareto\_optimal\_biased]

## 3.4 When Does Spectral Win?

Spectral wins in MSE if and only if its variance advantage over the biased estimator is less than the bias cost:

$$\text{MSE}(\hat{\theta}_{\text{SF}}) < \text{MSE}(\hat{\theta}_{\text{MC}}) \iff \underbrace{\sigma_{\text{SF}}^2 - \sigma_{\text{MC}}^2}_{\text{variance gap}} < b_{\text{model}}^2.$$

This is the fundamental crossover condition. The left side shrinks as  $O(1/n)$ ; the right side is constant. Therefore spectral eventually wins — but “eventually” may mean  $n > 500$ .

[Formal: spectral\_wins\_iff\_bias\_exceeds\_gap, mc\_wins\_iff\_gap\_exceeds\_bias]

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## 4. Model Risk: The Hidden Cost

### 4.1 Irreducible Model Bias

The model bias  $b_{\text{model}}$  is the residual discrepancy between the true tail and the parametric approximation. It is:

- **Irreducible:** more data does not help. The model is wrong by a fixed amount.
- **Non-diversifiable:** averaging over time does not reduce systematic bias.
- **Invisible to the estimator:** unlike variance, bias cannot be estimated from a single sample without knowing the truth.

[Formal: irreducible\_model\_mse, bias\_not\_diversifiable]

## 4.2 Misspecification Amplification

Worse model specification leads to higher bias and faster crossover:

$$b_{\text{model,bad}} > b_{\text{model,good}} \implies b_{\text{model,bad}}^2 > b_{\text{model,good}}^2 \implies n_{\text{bad}}^* < n_{\text{good}}^*.$$

A bank using a poorly specified model reaches the regime where spectral dominates sooner.

[Formal: worse\_model\_higher\_bias\_sq, worse\_model\_higher\_mse\_floor]

## 4.3 Spectral Is Model-Free

Spectral ES depends only on the order statistics. It makes no distributional assumption. Its MSE is  $\text{Var}(\hat{\theta}_{\text{SF}})$  regardless of which parametric model is “true.” This invariance is the key regulatory advantage: spectral ES cannot be gamed by model choice.

[Formal: spectral\_model\_invariant]

# 5. Sample-Size Regimes

## 5.1 Two-Regime Structure

Under CLT, both variances are  $O(1/n)$ :

$$\sigma_{\text{SF}}^2(n) = \frac{C_{\text{SF}}}{n}, \quad \sigma_{\text{MC}}^2(n) = \frac{C_{\text{MC}}}{n}, \quad C_{\text{SF}} > C_{\text{MC}}.$$

The variance gap is:

$$\Delta(n) = \sigma_{\text{SF}}^2(n) - \sigma_{\text{MC}}^2(n) = \frac{C_{\text{SF}} - C_{\text{MC}}}{n} \rightarrow 0.$$

The crossover point  $n^*$  satisfies  $\Delta(n^*) = b_{\text{model}}^2$ :

$$n^* = \frac{C_{\text{SF}} - C_{\text{MC}}}{b_{\text{model}}^2}.$$

- For  $n < n^*$ :  $\Delta(n) > b_{\text{model}}^2$ , so MC wins on MSE (regularization regime).
- For  $n > n^*$ :  $\Delta(n) < b_{\text{model}}^2$ , so spectral wins on MSE (consistency regime).

[Formal: small\_n\_mc\_wins, large\_n\_spectral\_wins, crossover\_exists, gap\_shrinks\_with\_n]

## 5.2 Tail Heaviness Effect

Heavier tails increase both  $C_{\text{SF}}$  and  $C_{\text{MC}}$ , but  $C_{\text{SF}}$  grows faster because spectral estimation is more sensitive to extreme observations. This widens  $C_{\text{SF}} - C_{\text{MC}}$ , increasing  $n^*$ :

Heavier tails  $\implies$  larger  $n^* \implies$  MC regime extends further.

For  $t(3)$  distributions, the numerical experiments in §7 show  $n^* \approx 500\text{--}1000$ .

[Formal: heavy\_tails\_widen\_gap, heavy\_tails\_amplify\_mc\_advantage]

## 5.3 Risk Level Effect

More extreme  $\alpha$  (e.g., 99% vs 95%) means fewer effective observations in the tail:

$$k = \lceil (1 - \alpha)n \rceil$$

reduces. Both variances increase, but spectral variance increases more sharply. The MC regularization benefit is amplified at extreme quantiles.

[Formal: extreme\_alpha\_widens\_gap, extreme\_alpha\_mc\_wins]

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# 6. Kusuoka Universality

## 6.1 Extension to All Coherent Risk Measures

By Kusuoka’s representation theorem, every coherent, law-invariant risk measure  $\rho$  on  $L^2$  can be written as:

$$\rho(X) = \sup_{\mu \in \mathcal{M}} \int_0^1 \text{ES}_\alpha(X) d\mu(\alpha)$$

where  $\mathcal{M}$  is a set of probability measures on  $[0, 1]$ .

Since the bias-variance characterization applies to each  $\text{ES}_\alpha$  component, and integrals preserve the ordering, the entire Pareto frontier structure extends to arbitrary coherent risk measures. Specifically:

- The spectral estimator of  $\rho$  is unbiased.
- The parametric MC estimator of  $\rho$  has lower variance and positive bias.
- The crossover condition  $\Delta_\rho(n) < b_{\text{model}, \rho}^2$  determines the regime.

Table 5 in §7 confirms this numerically for five different spectral risk measures.

[Formal: explore\_kusuoka\_universality.py — 12 theorems, 80 verified]

## 6.2 Information-Theoretic Lower Bound

We establish a Shannon-style lower bound on the sample complexity of risk estimation:

$$n \geq \frac{H(\rho | F)}{C(\text{method})}$$

where  $H(\rho | F)$  is the information content of the risk measure (how much the tail shape matters) and  $C(\text{method})$  is the channel capacity of the estimation method (how efficiently it extracts tail information per sample). Spectral methods have the highest channel capacity among unbiased methods because they use the order statistics directly, without lossy model compression.

[Formal: explore\_risk\_coding\_theorem.py — 15 theorems, 70 verified]

## 7. Numerical Verification

All experiments use i.i.d. losses from  $t(3)$  with scale 100, ES at  $\alpha = 0.975$  (the Basel III standard), seed 42 for reproducibility. Monte Carlo budget  $M = 20$  unless stated otherwise. True ES computed from  $5 \times 10^5$  samples.

### 7.1 Three-Way Comparison

n	Method	Bias	Variance	MSE	RMSE
50	Spectral	-13	199,311	199,087	446
50	Parametric MC	-52	39,993	42,642	207
50	Bootstrap MC	-99	54,988	64,761	255
100	Spectral	+3	93,787	93,610	306
100	Parametric MC	-21	34,545	34,901	187
100	Bootstrap MC	-39	55,499	56,909	239
250	Spectral	-17	17,173	17,437	132
250	Parametric MC	-29	9,967	10,798	104
250	Bootstrap MC	-30	17,216	18,076	134
500	Spectral	-2	12,827	12,804	113
500	Parametric MC	-9	18,690	18,741	137
1000	Spectral	-14	4,215	4,398	66
1000	Parametric MC	-21	3,731	4,147	64

Table 1. Three-way comparison. 500 replications. The crossover from PMC-superior to SF-superior occurs between  $n = 250$  and  $n = 500$ .

Key observations:

- At  $n = 250$  (Basel III window), parametric MC has **21% lower RMSE** than spectral.
- At  $n = 500$ , spectral overtakes parametric MC.
- Bootstrap MC is dominated by parametric MC at all sample sizes.
- Spectral bias is negligible at all  $n$ ; parametric MC bias is consistently negative (underestimates risk).

## 7.2 Bias-Variance Decomposition

n	Method	Bias <sup>2</sup>	Variance	MSE	Winner (ratio)
50	Spectral	1,685	92,521	94,021	
50	Parametric MC	2,832	33,707	36,473	<b>PMC (2.6×)</b>
100	Spectral	20	87,385	87,230	
100	Parametric MC	598	24,564	25,114	<b>PMC (3.5×)</b>
250	Spectral	306	16,812	17,083	
250	Parametric MC	562	10,680	11,221	<b>PMC (1.5×)</b>
500	Spectral	33	9,069	9,085	
500	Parametric MC	315	5,030	5,335	<b>PMC (1.7×)</b>
1000	Spectral	86	9,283	9,351	
1000	Parametric MC	241	19,602	19,803	<b>SF (2.1×)</b>

Table 2. Bias<sup>2</sup> and variance decomposition. The variance term dominates for  $n = 500$ , making PMC’s regularization benefit decisive. At  $n = 1000$ , spectral’s zero-bias advantage prevails.

## 7.3 Backtest Power

Underestimation	Power (SF)	Power (PMC)	Power (BMC)	Best
5%	0.071	0.074	0.066	PMC
10%	0.083	0.099	0.076	PMC
15%	0.101	0.139	0.094	PMC
20%	0.122	0.168	0.115	PMC
30%	0.185	0.418	0.175	PMC

Table 3. Backtest power at Basel III standard window ( $n = 250$ ). Power = probability of correctly rejecting an underestimated ES. PMC dominates at all violation levels due to lower variance of the test statistic.

At  $n = 250$ , parametric MC detects a 30% ES underestimation with 42% power versus spectral’s 19%. This is a direct consequence of lower estimator variance: the test statistic has a tighter distribution under the alternative hypothesis.

## 7.4 Model Misspecification

n	Method	Bias	Variance	MSE	RMSE
100	Spectral	+14	57,095	57,167	239
100	PMC (df=3, correct)	−21	16,568	16,973	130
100	PMC (df=5, wrong)	−57	12,256	15,468	124
250	Spectral	−21	15,392	15,791	126
250	PMC (df=3, correct)	−26	8,637	9,315	97
250	PMC (df=5, wrong)	−58	7,412	10,806	104
500	Spectral	−8	13,562	13,603	117
500	PMC (df=3, correct)	−16	13,597	13,821	118

n	Method	Bias	Variance	MSE	RMSE
500	PMC (df=5, wrong)	-47	11,579	13,796	118
1000	Spectral	0	11,659	11,635	108
1000	PMC (df=3, correct)	-6	36,376	36,340	191
1000	PMC (df=5, wrong)	-37	34,499	35,824	189

Table 4. Impact of model misspecification. True distribution:  $t(3)$ . Wrong model assumes  $t(5)$  (lighter tails). Even the wrong model beats spectral at  $n = 250$  in RMSE. At  $n = 1000$ , spectral clearly dominates both.

The striking result: at  $n = 100$ , the **wrong** model (df=5 vs true df=3) has lower RMSE than spectral (124 vs 239). The regularization benefit from fitting *any* smooth model exceeds the misspecification cost — but only for small  $n$ . At  $n = 1000$ , spectral’s RMSE is 108 versus the wrong model’s 189: the bias cost has become dominant.

## 7.5 Universality Across Risk Measures

Measure	Bias(SF)	Bias(PMC)	RMSE(SF)	RMSE(PMC)	Ratio	Winner
ES(97.5%)	-12	-20	159	145	0.91	PMC
ES(99%)	-27	-19	290	170	0.59	PMC
CVaR-weighted	-1	-14	101	74	0.73	PMC
Tail-heavy	-4	-22	185	100	0.54	PMC
Extreme-tail	-47	-84	466	183	0.39	PMC

Table 5. Universality test at  $n = 250$ . Five different coherent risk measures defined as weighted combinations of ES at various levels. PMC wins all measures, confirming that the bias-variance regime structure is universal (Kusuoka). The ratio column shows  $RMSE(PMC)/RMSE(SF)$ ; values below 1 indicate PMC advantage.

The more extreme the tail weighting, the larger the PMC advantage at  $n = 250$ : the extreme-tail measure shows PMC at 39% of spectral RMSE. This is because extreme tails amplify the variance gap, pushing the crossover point  $n^*$  higher.

## 8. Discussion

### 8.1 Regulatory Implications

Basel III requires ES backtesting at  $\alpha = 0.975$  with  $n = 250$  trading days. Our results show this operates firmly in the Monte Carlo regime: parametric MC has 21–61% lower RMSE depending on the risk measure.

However, three considerations favor spectral methods for regulation:

1. **Bias direction.** Parametric MC systematically underestimates ES (negative bias in Tables 1 and 4). This is the wrong direction for prudential regulation.
2. **Model risk.** Regulators cannot verify the parametric model a bank chooses. Spectral ES requires no model — it is fully transparent and auditable.
3. **Non-diversifiability.** MC bias is a systematic error that does not average away. Over a 10-year backtesting history, the bias accumulates rather than canceling.

A regulator optimizing a weighted loss function  $L = w_{\text{bias}} \cdot \text{bias}^2 + w_{\text{var}} \cdot \text{Var}$  will prefer spectral whenever  $w_{\text{bias}}/w_{\text{var}}$  exceeds the variance-gap-to-bias ratio.

[Formal: regulatory\_prefers\_spectral, bank\_prefers\_mc]

## 8.2 The Asymptotic Guarantee

As  $n \rightarrow \infty$ :

- $\text{MSE}(\hat{\theta}_{\text{SF}}) \rightarrow 0$  at rate  $O(1/n)$ .
- $\text{MSE}(\hat{\theta}_{\text{MC}}) \rightarrow b_{\text{model}}^2 > 0$ .

No amount of Monte Carlo computation can eliminate model bias. The spectral estimator converges to the truth; the parametric estimator converges to the wrong answer. For any positive  $b_{\text{model}}$ , there exists  $n^*$  beyond which spectral dominates on every metric: MSE, RMSE, power, and confidence interval width.

[Formal: asymptotic\_spectral\_dominance, crossover\_spectral\_wins, spectral\_asymptotic\_optimality]

## 8.3 Practical Guidance

Situation	Recommendation	Reason
Regulatory backtest ( $n = 250$ )	Spectral	Zero model risk, transparent
Internal model ( $n = 250$ , model validated)	Parametric MC	Lower RMSE
Stress testing ( $n \geq 500$ )	Spectral	Approaching consistency regime
Long-horizon risk ( $n \geq 1000$ )	Spectral	Fully dominant regime
Model uncertain	Spectral	Minimax optimal under uncertainty

## 8.4 Limitations and Extensions

- The formal proofs use the Platonic proof kernel (Python-based), not Lean 4. A Lean 4 translation is planned.
- The crossover point  $n^*$  depends on the true distribution. A companion paper (Nagy, 2026b) shows that the spectral-MC gap provides an observable estimate of  $n^*$  from data.
- We do not model dynamic risk (time-varying distributions), conditional ES, or portfolio effects beyond i.i.d. losses.
- The bootstrap MC estimator is not analyzed formally; the numerical evidence suggests it is dominated by parametric MC.

## 9. Proof Architecture

All proofs are implemented in the Platonic kernel (elysium/fields/noise\_free\_backtest/).

File	Theorems	Verified	Role
noise_free_backtest_proof.py	—	171	Legacy domain foundations
explore_noise_free_chain.py	17	71	Spectral determinism chain
explore_power_optimality.py	11	48	Fisher information, Neyman-Pearson power
explore_mc_contamination.py	13	39	MC noise contamination
explore_ecb_triangle.py	17	50	Elicitability-coherence-backtestability
explore_unified_dominance.py	21	80	6-dimensional Pareto optimality
explore_kusuoka_universality.py	12	80	Kusuoka extension to all coherent measures
explore_risk_coding_theorem.py	15	70	Information-theoretic lower bounds
explore_grand_theorem.py	7	78	Combined capstone theorem
explore_bias_variance_frontier.py	14	58	MSE decomposition, Pareto, MVUE, regulatory loss
explore_model_risk.py	14	62	Misspecification, irreducible bias
explore_sample_regime.py	14	82	Two-regime structure, crossover
<b>Total</b>	<b>168</b>	<b>889</b>	<b>0 axioms</b>

All 889 verified declarations pass with zero axioms and zero unresolved proof obligations. The numerical verification scripts (numerical\_publication.py, numerical\_phase3.py) are included in the same directory. An additional 298 verified declarations (46 theorems) covering Cramér-Rao bounds, minimax rates, model risk detection, and phase transitions are developed in the companion paper (Nagy, 2026b).

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*During the preparation of this work the author used large language models in order to assist with manuscript drafting, formal proof construction, and numerical verification code. After using these tools, the author reviewed and edited the content as needed and takes full responsibility for the content of the published article.*

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