**The Phenomenal Evidence Argument**

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ABSTRACT

Do perceptual states necessarily constitute evidence epistemically supporting corresponding perceptual beliefs? Susanna Schellenberg thinks so. She argues that perceptual states, veridical or not, necessarily provide (or constitute) a kind of evidence (for the existence of the truth-maker) supporting corresponding perceptual beliefs. She uses “phenomenal evidence” as a label for this kind of evidence and calls her argument “The Phenomenal Evidence Argument.” Having introduced her project, we offer a reconstruction of Schellenberg’s argument (§II). A key premise has it that, necessarily, for items with a function, fulfillment of the function (the good case) is explanatorily and metaphysically prior to function failure (the bad case). We suggest that the etiological theory of functions renders this key premise plausible (§III).  However, Schellenberg rejects the etiological theory of functions (§IV) and likewise the idea that the epistemic or warranting force of perceptual states is grounded in their being reliably linked to veridical perception (§V). But then what supports the key premise? Schellenberg argues that accurate perception is a part of the *nature* of perceptual capacities because the nature of perceptual capacities is explained in terms of their function, and their function is to represent accurately (§VI). We suggest that Schellenberg is committed to an understanding of priority which doesn’t require any *actual* good cases—just possible ones (§VII).  This reading, we argue, is too weak to support the key premise (§VIII). Given Schellenberg’s commitments, it is not necessarily the case that perceptual states are evidence for a corresponding perceptual belief. Before concluding we discuss an overgeneralization objection to Schellenberg’s argument (§IX).

KEYWORDS: perception, perceptual states, perceptual beliefs, evidence, phenomenal evidence, rationality, functions, etiological functions, Susanna Schellenberg.

**The Phenomenal Evidence Argument**

**I. ARE PERCEPTUAL STATES NECESSARILY EVIDENCE?**

Do perceptual states necessarily constitute evidence epistemically supporting corresponding perceptual beliefs? Susanna Schellenberg thinks so. In *The Unity of Perception* (Oxford, 2018) she provides an original argument for this conclusion. In this paper we expound and criticize her argument. Though thought provoking (for it addresses substantive issues in the metaphysics and epistemology of perception), we think it fails to reach its conclusion.

According to Schellenberg, token perceptual states are exercises of perceptual capacities, where perceptual capacities are capacities to single out (refer to) particulars of a type. The perceptual capacity BODY is a capacity to single out bodies; the perceptual capacity WHITE is a capacity to single out instances of whiteness; etc.

For Schellenberg, a successful exercise of a perceptual capacity is a veridical exercise of the capacity. A veridical perceptual state whose content we might gloss as “that white cup” successfully singles out a particular body (the cup), an instance of a property (of whiteness), and probably also an instance of the property being-a-cup (or instances of various shape properties).

She frequently calls token perceptual states that successfully single-out particulars “perceptions,” though she also sometimes calls them “accurate perceptions.” We shall call them veridical (or accurate) perceptual states, for “perception” (as a count noun) and “perceptual state” often mean the same thing, but not all perceptual states are veridical. What she calls a “perceptual experience” we call a “perceptual state.” Veridical perceptual state tokens “single out” particulars; non-veridical ones do not.

Schellenberg then argues that perceptual states, veridical or not, necessarily provide (or constitute) a kind of evidence for the presence of the corresponding distal state-of-affairs, a state-of-affairs that would make the perceptual state veridical (accurate). Perceptual states would then necessarily provide epistemic support for a corresponding perceptual belief. A perceptual state with the content “that white cup” necessarily provides evidence for the presence of a white cup, and thereby necessarily provides epistemic support for the belief *that is a white cup*.[[1]](#endnote-1) That’s the idea.

She uses “phenomenal evidence” as a label for this kind of evidence, where “phenomenal evidence” just means perceptual evidence that need not be veridical to be evidence (cf. Williamson 2000: 173). She then calls her argument “The Phenomenal Evidence Argument.” In another argument she calls “The Factive Evidence Argument” she argues that veridical perceptual states provide another kind of evidence she calls “factive evidence.” For Schellenberg, factive evidence is infallible while phenomenal evidence is not. Veridical perceptual states provide both kinds of evidence that combine to support the corresponding perceptual belief. Non-veridical states provide only phenomenal evidence.

This paper is about her first argument. Our thesis is that it fails to show that perceptual states necessarily constitute “phenomenal” evidence for perceptual belief.

**II. THE PHENOMENAL EVIDENCE ARGUMENT**

Here is our reconstruction of Schellenberg’s argument:

(P1) Necessarily, a perceptual capacity C is a capacity to single out particulars of type C, a capacity to produce an accurate (veridical) perceptual state of a certain kind. (Analysis of “perceptual capacity”)

(P2) Necessarily, X is a capacity to F only if X has the (natural) function of doing F. (34-37, 44 “…capacities are determined by functional relations…”) (Analysis of “capacity”)

(L1) Necessarily, a perceptual capacity C has the function of singling out particulars of type C; a perceptual capacity has the function to produce accurate (veridical) perceptual states. (34, 209; cf. Schellenberg 2019: 746) (From P1, P2)

(P3) Necessarily, for all items X with function F, the (good) case of function fulfillment (X’s doing F) is explanatorily and metaphysically prior to the (bad) case of function failure (X’s not doing F). (Analysis of “function”; 46-47, 175-176.)

(L2) Necessarily, for any perceptual state with the function of singling out a particular of a type, the (good) case of function fulfillment (accurate representation) is explanatorily and metaphysically prior to the (bad) case of function failure (inaccurate representation). Necessarily, because of the function of perceptual states, veridical perception is explanatorily and metaphysically prior to non-veridical perception. (The “Asymmetry Condition”; 32, 154) (From L1 and P3)

(P4) Necessarily, if X’s doing F is explanatorily and metaphysically prior to X’s not doing F, then X is systematically linked to doing F. (Warrant: Assertion by Schellenberg: 177, para 3).

(L3) Necessarily, perceptual states (generically) are systematically linked to veridical perceptions. (From L2, P4)

(P5) Necessarily, if X is systematically linked to Y, then it is prima facie rational to heed X and thereby believe Y. (Assertion by Schellenberg: 177)

(P6) Necessarily, if it is prima facie rational to heed X and thereby believe Y (if it is prima facie rational to believe Y based on X), then X is evidence for Y. It is rational to believe Y on X only if X is evidence for Y. (Analysis of “rational belief” and “evidence.”)

(L4) Necessarily, if X is systematically linked to Y, then X is evidence for Y. (From P5, P6)

(L5) Necessarily, perceptual states are evidence that they are veridical states, viz. they are evidence for the presence of a (the) corresponding distal state-of-affairs, a (the) state-of-affairs that would make the perceptual state veridical. Necessarily, all perceptual states, veridical or non-veridical, are evidence that they are veridical. (From L3, L4)

(P7) Necessarily, if perceptual states are evidence that they are veridical, then they are evidence possessed by the individual in support of a corresponding perceptual belief. (A bridge from L5 to the Conclusion) (For discussion, see Neta 2016: 909-910, 912.)

(Conclusion) Necessarily, all perceptual states (veridical or non-veridical) are evidence possessed by the subject for the presence of a (the) corresponding distal state-of-affairs that would make the perceptual state veridical, and so provide epistemic support for a corresponding perceptual belief. (From L5, P7)[[2]](#endnote-2)

The overall idea behind the argument is that perceptual states, veridical and non-veridical, necessarily provide evidence epistemically supporting perceptual beliefs because a function of perceptual states is to be veridical. As Schellenberg summarizes her view, “[t]he ground of the epistemic force of perceptual states lies in their function” (209; cf. 178, 186).

 How broad is the category of natural functions? Schellenberg does not provide a characterization of the notion. But she apparently includes artifacts as possessors of natural functions. She says “While biological functions are natural functions, not all natural functions are biological functions. After all, a computer can have a natural function, but it does not have a biological function” (36). If computers can have natural functions, then artifacts generally can have them too.

**III. A BASIS FOR (P3): THE ETIOLOGICAL THEORY OF FUNCTIONS**

For now, we shall grant (P1) and (P2). This brings us to (P3). Why believe it? One reason would be the popular etiological theory of functions, for on that theory (P3) is *obviously* true.

The best-known version of the etiological theory focuses on selection amongst variants for their effects as the ground of natural functions (Wright 1973, Millikan 1984). Roughly stated, the (selected-effect version of the etiological) theory is this: tokens of type X have the function of doing F (if and) only if ancestors of those tokens were selected for doing F. Once selection for doing F has occurred, tokens of the type acquire the function of doing F.  The function of our hearts is to pump blood, for ancestor hearts (of ours) were selected for pumping blood.

Here’s why (P3) is true given this (version of the etiological) theory. Since selection for doing F cannot occur unless ancestor traits did F, doing F in the past is necessary for the present possession of doing F as a function.  The item would not have F as a function—and so could not fail to perform its function—unless it (or its ancestors) had done F. The “good” case—past performance of F—is explanatorily and metaphysically “prior” to the “bad” case—function failure. (P3) is then obviously true. Past success (actual good cases) not only explains, but metaphysically grounds, the possibility of present failure (of bad cases), for past success grounds functions.

So if by (P3) we mean to add the qualification “etiological” then (P3) is very clearly true.

It is also natural to think that if an item has a function from selection that it will *reliably* fulfill its function. The healthy heart situated in the middle of your chest doesn’t pump blood occasionally, but all the time. If it didn’t pump blood reliably with (nearly) every beat, you would soon be dead. So, when it comes to the heart, reliable past success explanatorily grounds present persistence. The beating human heart is “systematically linked” to pumping blood in the sense of *reliably correlated*.

You could see why (P5) and (P6) would then seem so plausible. For if “explanatory and metaphysical priority” means that cases of reliable fulfillment of the function flow from the fact that the item has a function, then it would follow from the first two premises and the first two lemmas of the argument that perceptual states are reliable. There would then be a strong correlation between “S is in a perceptual state” and “S is in a veridical perceptual state.” Then you can see why a perceptual state would necessarily be evidence for the corresponding belief, for the *majority* of perceptual states would be *veridical*. Taking perception at face value would be a safe bet. Though non-veridical perceptual states would mislead, they would still raise the probability of true belief.

**IV.  SCHELLENBERG REJECTS THE ETIOLOGICAL THEORY OF FUNCTIONS**

This defense of (P3), however, won’t fly for the simple reason that Schellenberg rejects the etiological theory of functions.

Why? Because Swampman (Millikan 1984, Davidson 1987). Swampman is a molecule for molecule duplicate of a normal functioning human being. But Swampman bears no causal or explanatory relationship to any actual human being, with no past to speak of. For Swampman was miraculously created when a bolt of lightning hit a log in the swamp just moments ago. Even so, Schellenberg insists, Swampman’s traits have functions (217).

She thereby rejects the etiological theory of functions, and by implication “forward-looking” theories as well, for they too require a past for functions (Garson 2019).[[3]](#endnote-3) She then insists Swampman has perceptual capacities that have the function to single out particulars (2018: 217). “Possessing perceptual capacities does not depend on a history…of any usage” of those capacities, veridical or non-veridical (204). And given that Swampman’s perceptual capacities have functions, their exercises provide phenomenal evidence for perceptual beliefs: “Swampman not only has mental states with content, but also mental states with epistemic force” (2018: 36). Swampman “has [phenomenal] evidence even though he has no past interactions with anything” (217, 35).

But even if she had accepted the etiological theory of functions, it wouldn’t underwrite the conclusion that perceptual states are *necessarily* *reliable*. Why? Because the etiological theory of functions does not guarantee a priori that an item with an etiological function will *reliably* fulfill its function, even when functioning normally in normal conditions.

Ruth Millikan’s example that makes this point is sperm (Millikan 1984: 29, 34). Billions and billions of healthy sperm might be in normal conditions while operating normally, but only one—if that—will fulfill its function. If sperm fertilize eggs *often enough*, then sperm will acquire fertilizing eggs as their function. Often enough for a heart is all the time. Often enough for sperm is once in a blue moon.

Cases like this occur because of the fitness costs and benefits of various strategies. If it is cheap to produce billions and billions of sperm that hardly ever fulfill their function—and another strategy to ensure reproduction would be more or too expensive—then Mother Nature will choose the unreliable (but cost effective) route.

Here’s another well-known example: the rabbit is a skittish creature. At the slightest sign of danger, it flees. But there is rarely any danger; it frequently runs and hides when there is nothing to fear. But it is better for the rabbit to run and hide at the slightest sign of danger and pay the cost of false belief than it is to stick around to collect more evidence. For if it does, though it may form reliably true beliefs that danger is absent, just one false negative and the rabbit is someone’s dinner (Burge 2003). A wise man may proportion his belief to his evidence; a wise rabbit does not.

This example shows that even if producing *accurate* representations is an etiological function of a representational capacity, producing *reliably* accurate perceptions need not be. The rabbit’s capacity to represent danger might have the etiological function of doing so accurately, but it certainly doesn’t have the etiological function of representing danger *reliably*. Representational capacities do not *necessarily* have the etiological function of representing *reliably* (Graham 2012). Some do, some don’t.

**V.  SCHELLENBERG REJECTS RELIABLE CORRELATION**

**FOR PHENOMENAL EVIDENCE**

Schellenberg wouldn’t be bothered by any of this, for she does not think reliability matters for whether perceptual states are evidence. She’s quite explicit:

Some perceptual capacities may be reliable. However, even if that is the case, it is the systematic linkage to particulars that gives experience its epistemic force. The notion of systematic linkage…is not a reliabilist notion. *Thus, the epistemic force of perceptual experience does not depend on whatever reliability (if any) perceptual capacities might have*. (177, emphasis added, cf. 47)

“Reliability,” she says, “simply plays no role” (216).[[4]](#endnote-4)

If you were surprised by this, you are not alone. Just after quoting the arch-reliabilist Alvin Goldman favorably in her chapter on perceptual evidence (priming one for the endorsement of a reliability condition on evidence), she introduced the phrase “systematic link” as follows:

It is plausible that the reason it is [rational to take perceptual states] at face value is that doing so helps us successfully navigate the world. Evidence can play that role, however, only if there is a systematic link between our [perceptual states] and the way our environment actually is. (173)

We took this passage to mean that perceptual states provide perceptual evidence epistemically supporting corresponding perceptual beliefs for they provide reliable guides to the layout of particulars and their (instantiation of) properties and relations in our environment (cf. 179). We thought by “systematic link” she meant “reliable link.” Turns out we were wrong.

So what does she mean? Here is the key passage:

[Perceptual] states [in general] are systematically linked to particulars of the type that the [perceptual] state is of in the good case, *in the sense that* the perceptual capacities *employed* in the bad case are explanatorily and metaphysically parasitic on their *employment* in the good case. This systematic link stems from it being the function of the perceptual capacities *employed* to [produce accurate perceptual states]…The notion of systematic linkage in play is understood in terms of a metaphysical and explanatory primacy notion… (177, 183, emphasis added)

“Systematic linkage” for Schellenberg then just means “explanatory and metaphysical priority” where that “stems from...function.” That’s why (P4) is true. And that’s why “systematic linkage” is an asymmetric notion in her hands, for priority is an asymmetric notion.

But given all that “systematically linked” means is “explanatory and metaphysical priority,” the phrase can be dropped throughout the argument and replaced with “explanatory and metaphysical priority,” for that phrase is doing all the work.

Rewritten, (P4) becomes a triviality. (P5), (P6) and (L4) then become:

(P5\*) Necessarily, if X’s doing F is explanatorily prior to X’s not doing F, then given an X it is prima facie rational to heed X and thereby believe that X is doing F (Assertion by Schellenberg: 177)

(P6\*) Necessarily, if it is prima facie rational to heed X and thereby believe X is F, then X is evidence that X is (doing) F. It is rational to believe Z on X only if X is evidence for Z. (Analysis of “rational belief” and “evidence.”)

(L4\*) Necessarily, if X’s doing F is explanatorily prior to X’s not doing F, then X is evidence that X is (doing) F. (From P5\*, P6\*)

**VI. SCHELLENBERG’S ARGUMENT FOR (P3)**

We are now back to square one: if the etiological theory of functions does not ground (P3), what does? Why should we think that the “explanatory and metaphysical” priority of the good case follows from the function of perceptual capacities? Here is Schellenberg’s answer (46-7, 175-176):

(Pi) If an entity has doing F as its function, we metaphysically explain the entity by its function: the function is a part of the nature of the entity. Functions type natures.

(Pii) If an entity has doing F as its function, then the entity does not have doing not-F as its function. “[P]erceptual capacities function to single out particulars rather than function to fail to single out particulars.” (175-176)

(Li) If we metaphysically explain the nature of an entity by its function to do F, then we do not explain the entity by doing not-F (at least not in the first instance), for that is not its function. Applied to perceptual capacities, we explain them in the first instance by the function of representing veridically. (From Pi and Pii)

(Piii) Fulfilling a function is the good case. Failure to fulfill a function is the bad case.

(Lii) So for any entity with doing F as its function, we metaphysically explain its nature by the good case and not the bad case (at least in the first instance). (From Li and Piii)

(Piv) If we metaphysically explain an entity by the good case and not by the bad case (at least in the first instance), then the good case is metaphysically and explanatorily prior to the bad case.

(P3) Necessarily, for all X with doing F as its function, the (good) case of function fulfillment (X’s doing F) is explanatorily and metaphysically prior to the (bad) case of function failure (X’s not doing F). (175-176.) (From Lii and Piv)

Applied to perceptual capacities, the idea is that they have accurate perception as a function, and so as a part of their nature. We thereby explain perception by its function. And its function is veridical perception, not non-veridical perception. We thereby explain its nature by veridical perception. Since we explain its nature by veridical perception (in the first instance), veridical perception is explanatorily and metaphysically prior to non-veridical perception. As Schellenberg adds in italics, perceptual capacities “*are by their nature defined in terms of*” successful perceptual states (2108: 46-47).

**VII.   POSSIBLE SUCCESS GROUNDS EVIDENCE**

There are three possible readings of understanding her key notion of “explanatory and metaphysical priority” in this argument.

The first is an extremely weak, conceptual-priority reading. On the conceptual-priority reading, to say that success is prior to failure is only to make a conceptual point that the intelligibility of failure (of bad cases) depends upon the prior existence of a standard for success, on a standard for good cases set by the function. The standard may exist full well, even if it is never met. And so on the conceptual priority reading, we can’t infer from knowing of some X that it has F as a function that it or any X has ever done (or ever will or even can do) F.

An example of conceptual priority that illustrates just how weak it can be would involve the notion of a *greater-than-10-odd-even* number. Such a number is greater than 10 and both odd and even. To understand this notion, you must first grasp the notions *10*, *greater than*, *odd* and *even*. Those notions are conceptually prior – and so “metaphysically and explanatorily prior” – to the invented notion. But even so, nothing could possibly satisfy this new notion.

 The second reading is a (somewhat) strong, actual-success reading. On the actual-success reading, to say that success is prior to failure entails that failure is only possible if there have been (or are) some *actual* successes—some genuine good cases where the capacities are “actually” employed. One could then infer, from knowing of some X that it has F as a function, that there have been (or are) some X’s that have done F, that the capacity has been *successfully* *employed*. The (selected effect version of the) etiological theory is one way of respecting this reading.

 The third reading is an intermediate, possible-success reading. On the possible-success reading, to say that success is prior to failure entails that failure is possible only if success is (metaphysically) possible. One cannot then infer, from knowing of some X that it has F as a function, that there have been some X’s that have actually done F, but only that there are some X’s in some possible worlds that have done F in those, possibly remote, worlds.

The functions of some artifacts illustrate the possible-success reading. Recall the history of flying machines before the Wright brothers. Many flying machines—perhaps thousands or more—were built that did not fly, though there may be possible worlds where they would; they just needed the right circumstances and laws of nature to fly. Regardless of never *actually* flying, flying was their function. So at least for artifacts, there can be functions that are fulfilled in some possible world but not in the actual world; the *intelligibility* of failure does *not* presuppose the *actuality* of success.

         Though there is evidence that she has the actual success reading in mind,[[5]](#endnote-5) when it comes to presenting her argument, she adopts the intermediate possible-success interpretation:

[T]he idea that [perceptual] states are systematically linked to what they are of in the good case requires *only that there is a possibility of getting things right* in the good case. *This is compatible with there not being any actual good cases….[T]he mere possibility of good cases is sufficient*. (201, emphasis added).

The…phenomenal evidence argument requires only [the] weaker claim…that any perceptual capacity is grounded in how things would come out in the good case. (176 n. 16).

Perceptual functions never require an *actual* good case, only *possible* good cases. Swampman needn’t worry.

         Now you can see why she cannot mean “reliable link” by “systematic link” because by “systematic link” she means “possible-success” and by “possible-success” she allows that an X is never actually accompanied by a Y. She even makes a remark that suggests conceptual priority might be enough: “A perceptual capacity has a certain function irrespective of whether it fulfills its function in *any* particular context of employment” (2018: 36, emphasis added). An entirely unreliable correlation can still be, for Schllenberg, a “systematic link.”

With this understanding of “explanatory priority” in mind, let’s restate her argument once more (focusing on perception) before turning to criticism. We will drop (P4) as well as the asterisks from above.

P1. Perceptual capacities are capacities to single out particulars. Exercises of such capacities that do single out particulars are veridical perceptual states.

P2. A perceptual capacity has the function to single out particulars. A perceptual capacity has the function of producing veridical perceptual states.

P3. Conceptually speaking, we type (explain) items with functions in the first instance by their functions. But no capacity needs to ever fulfill its function in any actual circumstance for this to be true; the capacity may fail on every occasion of its actual exercise. So we explain perceptual capacities by their function of producing veridical perceptual states. But no perceptual state ever has to be veridical in the actual world for this to be so.

P5. If we type (explain) an item with functions in the first instance by their functions, then if you know that an item with a function is being exercised (or employed, used, or tokened), then it is rational to believe that the item is being successfully exercised in the actual world, that it is fulfilling its function. So, in particular, if you were to know that a perceptual capacity is being exercised and thereby producing a token perceptual state, then it is (would be) rational to believe that the perceptual state is veridical.

P6. If it is rational to believe P on the basis of X, then X is evidence that P is true. So if it is rational to believe P on the basis of a perceptual state, then the perceptual state is evidence that P is true. So perceptual states are necessarily evidence that they are veridical perceptual states.

P7. If a perceptual state is evidence that it is veridical, then (as a representational mental state that directly and normally causes a corresponding perceptual belief) it is evidence possessed by the individual that provides “epistemic force” for the corresponding perceptual belief.

C. Perceptual states are necessarily evidence possessed by the individual for the presence of a corresponding state-of-affairs that provides epistemic support for the corresponding perceptual belief.

**VIII.   (P5) AND (P6) ARE FALSE**

We granted (P1) and (P2). (P3), read as conceptual priority, is unobjectionable as it stands. We also do not object here to a possible-success reading (though there may be very good reasons to object to such a reading, as an anonymous referee rightly noted). The remaining premises are (P5)-(P7). We shall focus on (P5) and (P6). (Again, for discussion of (P7), see Neta 2016, 2022.)

The only thing Schellenberg tells us about evidence comes in P6. Reworked for generality, P6 is the idea that if it is rational to believe h on e, then e is evidence for h. We think this is false. It can be rational to believe that you have a headache based on your headache, but your headache is not evidence that you have a headache. Evidence does not work like that. P6 just isn’t true.

What’s true is the reverse: if e is evidence for h, then e is (or provides, given possession and appreciation) a good reason (a warrant) to believe h (Achinstein 1978). That’s the job or function of evidence. So a good account of the *evidence for* relation must entail that evidence is (or provides) a good reason (a warrant) for belief. Though not all rational beliefs are based on evidence, beliefs (appropriately) based on evidence are (prima facie) rational (warranted) beliefs.

Is this a problem for Schellenberg? No. She just needs to drop (P6) and revise (P5) to (P5V):

(P5V) If we type (metaphysically explain) an item with functions in the first instance by their functions, then if an item with a function is being exercised (employed, used, tokened), then that is evidence that it is fulfilling its function. So if a perceptual capacity is being exercised and thereby producing a token perceptual state, that is evidence that the perceptual state is veridical.

With that fixed, we now argue intuitively against both (P5) and (P5V). Let’s start with the case against (P5).

 Suppose you know that some invention has the function of flying. You then know (suppose) that “to fly” is a part of its nature, that you first explain the invention with the concept “to fly” and not “not to fly.” Suppose this entails that there is then at least one possible world where the item flies. Is it now (objectively or subjectively) rational for you to believe that it will fly? Is it now (objectively or subjectively) rational for you to climb aboard? Hardly. If all you know is that the invention has a function in the sense of possible-success you would not be rational at all to believe that it works on *this* occasion or even on *any* occasion in the *actual* world. For working on any occasion in the actual world is not a requirement for having a function (according to Schellenberg), only that there is some possible world where it does. For all you know a priori, it has never worked in the actual world and never will. Just because it might work somewhere and somewhen does not make it rational to believe it will work here and now. And this is not just true for artifacts, but for all “natural” functions (again, at least by Schellenberg’s lights). Knowing that something *might* work in some *possible* circumstance does not make it (objectively or subjectively) rational to believe that it *will* work in one’s *actual* circumstances. (P3) might be true, but understood in terms of possible-success, it is not strong enough to support (P5). On its face, (P5) is false.

 What about substituting “rational to believe” with “evidence” as in (P5V)? Does that help? No. Not at all. That the plane has a function (on the possible success reading) is not (objective or subjective) evidence that it will fulfill its function. Indeed, the reason why it is *not evidence* that it will fulfill its function explains why it is *not rational* to believe that it will fulfill its function.

 Think about hearts. A heart has the function of pumping blood. Suppose that is a priori, i.e., that it is a priori that if X is a heart then X has the function of pumping blood. (Suppose, that is, that whether the organ in the middle of our chests is a heart is an empirical question. Harvey then not only discovered empirically that the organ in our chests had the function of pumping blood, he also thereby discovered empirically that it was a heart.) Suppose also that it is a priori that we explain, in the first instance, what a heart is by its function, in the possible-success sense of “explanatory priority.” Does that fact establish that whenever a heart is employed, that its employment is evidence that it is pumping blood? Certainly not a priori. And it is not even true in general that beating hearts pump blood. For a heart (all else being equal) only pumps blood in normal conditions (in the middle of someone’s chest, hooked up to the rest of the circulatory system, in a living being full of blood) when functioning normally (not defective or diseased). To pump blood, all else being equal, a heart must also be functioning normally in normal conditions. Having a function is not enough. From the mere fact (knowable a priori, we are supposing) that we cite the heart’s function to type the heart does not constitute evidence (or make it rational to believe) that it will pump blood when exercised, even if necessarily one heart somewhere and somewhen in some possible world pumped blood.

 We can put our point in terms of probability. Suppose you know that you have a ticket in a fair lottery, where there are a million total tickets. Does knowing this give you evidence that your ticket will win? Does knowing this make it rational to believe that your ticket will win? Hardly. Now think about Schellenberg’s position on explanatory priority. On her view, if X has F as a function, that means there is at least one possible world where X did F at least once, where this possible world need not be the actual world. Now there are an infinite number of possible worlds. Suppose you know that an X has F as a function and that X is being exercised in the actual world. What does that tell you a priori? Does it tell you that X is fulfilling its function F in the actual world? No. Does it tell you that there is a probability that X is fulfilling its function in the actual world? No. All it tells you is that there is at least one possible world in the infinity of possible worlds where X is exercised, and X is fulfilling its function there. That world might be the actual world, but that is not something you know a priori. So all Schellenberg’s (P3) allows us to conclude about functions is like knowing that you own one ticket in a possible worlds lottery, where someone somewhere in some possible world will win the lottery. And there is no way that gives you evidence that you will win. On Schellenberg’s (P3), when it comes to functions you are in an even weaker position than someone who is playing a lottery with at least one winner in the actual world. That’s why we think (P5) and (P5V) are evidently false.

Once Schellenberg’s argument is made clear, it’s clear why it won’t work. It’s just not at all plausible that one can derive a conclusion about *evidence* from her premise about “metaphysical and explanatory *priority*.”

**IX. THE OVERGENERALIZATION OBJECTION**

Now that we have objected to her argument, we want to discuss a related objection that she raises herself: the overgeneralization objection.

The phenomenal evidence argument moves from a premise about the function of perceptual states to the conclusion that perceptual states necessarily provide evidence for what is, in effect, the claim that the state has fulfilled its function. We have just argued that general move from function and explanatory priority (in the possible-success sense) to evidence is false: just because X has doing F as a function (in this sense) does not mean an exercise of X provides evidence for the fulfillment of the function. But suppose we were to grant that core premise. If so, then the argument would overgeneralize in a way that Schellenberg seeks to avoid, for good reason.

 Why? Because *beliefs* have the function of being true. Surely if perceptual states have accuracy as a function, then beliefs have truth as a function. And so, by Schellenberg’s lights, true belief is then explanatorily and metaphysically prior to false belief, and then, by the rest of her reasoning, we should be able to conclude that beliefs necessarily provide (constitute) evidence epistemically supporting themselves. If we treat perceptual states as necessarily evidence, why aren’t beliefs necessarily evidence too? But beliefs are *not* necessarily evidence for themselves. Schellenberg herself raises this issue: why is it “rational to treat [perceptual] states as [necessarily] evidence [for corresponding beliefs] but not beliefs” as evidence for themselves (178)?

After raising the objection, she seeks to block it: perceptual states are necessarily evidence, but beliefs are not. Why does her “argument…for why it is rational to heed the testimony of our senses [not] overgeneralize to beliefs” (178)? Here is her answer: “[T]he capacities that determine beliefs are not systematically linked to what they are of in the good case in the sense that there is an explanatory and metaphysical primacy of their employment in the good case” (174).

We think there are two ways of interpreting this response. First, beliefs have being true as a function, but their function is not “systematically linked” to truth, and so truth is not “explanatorily and metaphysically prior” to error. In other words, the middle steps of her argument for perceptual states would not apply to belief states. Or second, beliefs do not have the function of being true. The first steps of her argument would not apply to beliefs. Either way the argument would not apply to beliefs and so would not overgeneralize.

The first way seems entirely ad hoc, and inconsistent with the general idea that functions are to be “explained” and “grounded” in the good case. Indeed, if beliefs have functions but their functions are not to be “explanatorily and metaphysically” by the good case, then it seems we have a counterexample to the principle she needs connecting functions to the good case in her argument.

The second way also seems implausible. Why should we believe perceptual states are supposed to be accurate but perceptual beliefs are not supposed to be true? Compare Tyler Burge’s epistemology, that starts with the idea that it is a priori necessary that both perception and belief function to be veridical: accuracy for perception and truth for belief (Burge 2003, 2020). So is Schellenberg being consistent here? Is it consistent to claim, as Schellenberg does, that perceptual capacities have the function of producing accurate perceptual states, but that capacities to form beliefs do not have the function of producing true beliefs? We don’t see why.

We think the better move here is to say both perception and belief have functions to represent veridically, but to drop the assumption that exercises of functional items necessarily provide evidence for their fulfillment. In other words, the fact that the argument prima facie overgeneralizes is a better reason to abandon the argument than it is to deny that beliefs have the function of being true.

**X.  CONCLUSION**

Schellenberg’s argument falls within a long tradition of trying to establish that perceptual states necessarily provide epistemic support for perceptual beliefs. A qualified version of the thesis can be found in the Stoics, grounded in providence. Descartes also appealed to God’s goodness to show that certain classes of perceptual states could not be misleading. The idealists instead guaranteed the evidential force of perceptual states by reducing the external world to patterns of perceptual states. All these efforts in the history of philosophy sought to show that perceptual states necessary support perceptual beliefs for perceptual states are necessarily reliable. But with the downfall of theology as the foundation of epistemology, the rejection of idealism, and the subsequent rise of Darwinian thinking about mental capacities, philosophers must confront the fact that perceptual states are not *necessarily* reliable, not even in normal conditions when normally formed (Burge 2020, Graham 2024). A question then emerges for epistemology: if perceptual states as such are not necessarily reliable, do they necessarily provide epistemic support for perceptual beliefs, even so? So-called reliabilists say no. So-called internalists say yes.

Schellenberg’s argument falls within the so-called internalist tradition. Instead of appealing to various aspects of the *phenomenology* of perceptual states (like so many in this tradition), she appeals to their *function*. Their function, she claims, is a necessary feature of perceptual states, and their functions are necessarily grounded in success. The problem is that, even if all of this is true, the functions of perceptual states are not *necessarily* grounded in *reliable* success. Why they should provide epistemic support, necessarily so, then remains an open question. Perhaps it is better to abandon the assumption that perceptual states must necessarily support perceptual beliefs. Though we applaud the appeal to the functions, perhaps it is best to recognize that perceptual states, when they do epistemically support perceptual beliefs, do so only contingently, not as a part of their very nature.[[6]](#endnote-6)

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1. Actually, Schellenberg thinks phenomenal evidence only supports general beliefs like *there is a cup*, or perhaps general beliefs with indexicals like *there is a cup there*. She does not think phenomenal evidence supports singular beliefs of the form *that is a cup*. Only so-called “factive” perceptual evidence supports singular beliefs of that form. We shall ignore this complication here, as neither our exposition of her argument nor our criticism turns on this point. [↑](#endnote-ref-1)
2. Schellenberg puts her conclusion somewhat differently than we do. Here is how she puts it:

If S perceives α [a particular particular] or suffers an illusion or hallucination as of α (*while not suffering blindsight or any other form of unconscious perception*), then S is in a phenomenal state that provides phenomenal evidence for the presence of α. (2018: 171, emphasis added)

Recast, her conclusion is: if S has an *access* *conscious* perceptual state (accurate or inaccurate), then S is in a phenomenal state that provides phenomenal evidence for the presence of a corresponding state-of-affairs and so epistemically supports a corresponding perceptual belief. Why does she restrict the antecedent to perceptual states that are access conscious? Does she think that access unconscious perceptual states with phenomenal character are impossible? No:

It is important to note that being in a phenomenal state, as I understand the term, does not necessarily imply that one is in a conscious phenomenal state…Indeed, I argue that unconscious perception is a matter of being in a mental state with phenomenal character without having access to that phenomenal character. (185-6, n. 27)

Does she think that access unconscious perceptual states do *not* provide perceptual evidence? No. In fact she says the opposite: “On my view, there is no difference in the epistemic force of a phenomenal state dependent on whether that phenomenal state is conscious or unconscious” (185-6, n. 27). Since she says they are possible and that they provide equal epistemic force, we do not know why she restricts her antecedent to perceptual states that are access conscious. Furthermore, as far as we can tell, access consciousness plays no role in her argument, and she even says access is not a requirement on phenomenal evidence (179). Consequently, we have left access consciousness out of our discussion. [↑](#endnote-ref-2)
3. The reason that “future-looking” theories require history is that they refer to normal conditions in their definitions, but to account for normal conditions they appeal to history: normal conditions are those conditions that have prevailed in the (relevant stretch of the) past, etc. So without a past, there are no normal conditions, and so no “future-looking” effects to ground functions. Since Schellenberg adopts an ahistorical epistemology, she cannot appeal to forward-looking theories of functions.

Schellenberg cites Bence Nanay (2010) as arguing that etiological theories of function are circular. Nanay’s explicit point, however, is more general: he argues that any theory that attributes functions to types (as opposed to tokens) is circular, not just etiological theories. The argument is that if we attribute functions to traits, we must first type traits by their functions. Neander and Rosenberg (2012) reply that we type traits and attribute functions at the same time (their supervenience base overlaps), avoiding the objection. See Nanay 2012 for his rejoinder. For criticisms of Nanay’s theory, see Rosenberg and Neander 2012 and Artiga 2014.

Also worth noting here, the organizational theory of functions (as an etiological theory) can be given a “token-first” interpretation, avoiding Nanay’s objection on its *own* terms. The organizational theory can also ascribe functions to Swampman without much time having to pass. See Graham 2023 for references and discussion.

Nanay’s “modal” theory arguably avoids the history problem (2010), as it makes no immediately obvious reference to history. Regardless, Nanay’s theory is of no help for Schellenberg (if she were to appeal to it to ground functions for Swampman), for function attributions on Nanay’s theory depend on the token trait contributing to fitness in close possible worlds. But a Swampman might come into existence where few if any of its traits contribute to fitness in its actual world or its close possible worlds. In other words, if every Swampman has traits with the same functions as Davidson’s traits, Nanay’s theory won’t ground that conclusion in every case. Nanany’s modal facts won’t save Schellenberg’s Swampman. [↑](#endnote-ref-3)
4. In various places Schellenberg remarks that “...perception is not in particular a reliable faculty” (216; 2022: 243). She does not say why. This is a surprising claim as we so reliably navigate our environments. Isn’t that partly because perception reliably represents our environment? That’s the consensus in vision science (Palmer 1999: 5-6, 9; Foley & Matlin 2010: 9-10; Frisby & Stone 2010: 11; Huber & Wilkinson 2010: 401).

Perhaps she has in mind evidence from perception scientists that some types of perceptual states are not strictly accurate in all aspects of their representational content but are only approximately accurate. For instance, strictly accurate representations of the distance of a surface (e.g. 100 cm away vs. 99.5 cm away) are relatively rare. But this failure to be strictly accurate in every case is not a cause for alarm. Failure of strict accuracy in some cases is compatible with representations as accurate as theoretically possible, given the perceptual systems’ natural limitations. And that is what the evidence from vision science suggests in these cases (Blakemore 1970; Geisler et al 2001; Ernest and Banks 2002; D’Antona et al 2013; Burge & Geisler 2014). So it is one thing to be *approximately veridical* and quite another to be *radically non-veridical*, to represent a nearby surface as far away, a square as a circle, or a bunny as a banana (Burge 2020: 110-111).

Does the possibility that many representations are only approximately accurate in some of their aspects show that *most* perceptual states are systematically misleading, so that perception is “not in particular a reliable faculty”? We don’t see how. Accuracy not only comes in degrees (something Schellenberg recognizes: “...the accuracy of perceptual states comes in degrees: perceptual content can be more or less accurate…” (93)), reliability does too. A perceptual capacity can be reliable if most of its perceptual states are mostly accurate. Just as some cars are more reliable than others but are still reliable cars for all that, the fact that some of our perceptual states are not fully accurate in all respects of their representational content does not show that perception is not a reliable representational faculty, that most perceptual states are mostly inaccurate in most aspects of their representational content (see also Buckwalter and Turri 2020). [↑](#endnote-ref-4)
5. By our lights, Schellenberg often seems to slide between the conceptual priority, the possible-success, and the actual-success interpretations. Passages in her work often read as if she is embracing the actual-success interpretation, only to qualify it at times with remarks that are less committal (185; 2022: 240, 241).

There are some places she clearly has the actual success reading of “explanatory and metaphysical priority” from functions in mind. She says that for an individual to have a perceptual capacity C, at least someone (either the subject herself or some other individual that the subject is “bridged” to) must have successfully employed the capacity to single out a particular of type C (or of a relevantly similar type). She calls this the “modest grounding” of perceptual capacities in cases of *actual* success (160). On this view, “there cannot exist a perceptual capacity that has not been employed successfully by someone, somewhere” (161). Even a massively deceived “brain in a vat could have [referential illusions] as of white cups” but only if “the brain acquired the relevant perceptual capacities from someone who had [veridically] perceived sufficiently similar particulars” (161). No actual success somewhere by someone, no perceptual capacity C for anyone. Hence, no functions without some actual success.

One reason to prefer an actual-success interpretation (that adds even more bells and whistles) was suggested by an anonymous referee: on the possible success reading, it seems that a “good” case in some possible world might be wholly accidental. Now a key point about functions is that there is a distinction between functions and accidents, as well as between accidental and non-accidental success. How would a “merely possible” success condition ground those distinctions?

Though Schellenberg does not argue that our perceptual capacities are modestly grounded, she says “…it is plausible…that [perceptual] capacities are grounded in actual [veridical perceptual states] and not just possible [veridical perceptual states]” (176, n. 16). She says she is “committed to perceptual capacities being modestly grounded” (160). So that’s the evidence for thinking she has the actual success reading in mind when talking about “explanatory and metaphysical priority” grounded in “functions.” Maybe Swampman *should* worry after all. [↑](#endnote-ref-5)
6. For approaches to the epistemology of perception that simultaneously appeal to functions while recognizing the contingency of the reliability of perception, even in normal conditions (without theology), see Burge 2003, 2020 and Graham 2012, 2014, 2023, 2024 among others.

 We are grateful for comments that led to improvements from Adam Carter, Jack Lyons, and two anonymous referees. [↑](#endnote-ref-6)