Phenomenal Conservatism¹ LUCA MORETTI

1. Phenomenal conservatism: the basics²

Phenomenal conservatism is the view according to which, roughly, the way things *seem* or *appear* to be is a source of epistemic justification. According to phenomenal conservatism, for instance, one can have some justification for believing that the cat is on the mat simply because it *seems* visually to one that the cat is on the mat.³ The central intuition of the phenomenal conservative is that one should grant that things are the way they appear to be unless one has reasons for doubting it. Phenomenal conservatism is internalist in character at least because it takes the seeming-based justification of one's beliefs to depend entirely on one's mental states (cf. Huemer 2006, 2011, 2014).⁴ Phenomenal conservatism is customarily associated with Michael Huemer's work. Huemer defines phenomenal conservatism as follows:

(PC) If it seems to [a subject] S that P, then, in absence of defeaters S thereby has some degree of justification for believing that P. $(2007: 30)^5$

Although (PC) is about *S*'s *propositional* justification, there is a corresponding version of it about *S*'s *doxastic* justification:⁶

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 $^{^{2}}$ For a general introduction to phenomenal conservatism and cognate views see Tucker (2013b). A more elementary introduction is Huemer (2014). A rich anthology of phenomenal conservatism and related views is Tucker (2013a).

³ Phenomenal conservatism must not be confused with *doxastic* conservatism, which says that one's mere *believing* that P gives one some justification for P provided that one has no reason for doubting that belief (cf. Huemer 2014: §1d.)

⁴ Nevertheless, variants of phenomenal conservatism compatible with externalism or explicitly externalist have been proposed by – among others – Goldman (2008), Bergmann (2013b) and Pryor (2013).

⁵ Huemer (2001) defended a stronger version of (PC) according to which, for any P, if it seems to S that P, in absence of defeaters S has thereby justification for *fully* believing that P.

⁶ S has propositional justification for P just in case P is epistemically worthy of being believed by S, because S has a reason for doing so, whether or not S actually believes that P for that reason or at all. Furthermore, S has doxastic justification for P just in case S has propositional justification for P and bases her actual belief that P on the reason she has for P.

In absence of defeaters, S's belief that P is justified to some degree if it is based on S's seeming that P. (Cf. Huemer 2014: \$1c)

Other authors have proposed similar views, though less articulated or narrower in scope (e.g. Chisholm 1989, Audi 1993, Swinburne 1998, Pollock and Cruz 1999 and Pryor 2000, 2004). (PC) or close variants of it have been invoked to explain the justification of beliefs of different types – in particular, perceptual (e.g. Pryor 2000, Huemer 2001 and Lycan 2013), moral (e.g. Huemer 2005), mnemonic (e.g. Pollock and Cruz 1999), a priori (e.g. Bealer 2000 and Chudnoff 2011) and religious (e.g. Tucker 2011).

While (PC) looks natural and intuitive (people ordinarily accept that appearances provide reasons for believing propositions), it also proves philosophically appealing for a number of immediate reasons. To begin with note that (PC) says if it seems to *S* that *P*, in absence of defeaters *S thereby* has some justification for believing that *P*. Here, 'thereby' indicates that *S*'s seeming is the only basis of *S*'s justification for *P*. Seemings are customarily conceived of by the advocates of (PC) as *experiences* rather than beliefs (more on this in §2). Accordingly, (PC) supports fallible foundationalism because it entails that many of our beliefs can have *non-inferential* prima facie⁷ justification – namely, prima facie justification not based on the justification for other beliefs (cf. Huemer 2001: §5 and Pryor 2000). Furthermore, (PC) seems to offer a straightforward response to external world scepticism: suppose it visually appears to *S* that (*P*) there is a hand. If (PC) is true, *S* will have prima facie justification for believing that *P* on the mere basis of her appearance even if *S* hasn't any independent justification for believing that no sceptical scenario is instantiated (cf. Huemer 2001 and Pryor 2000, 2004).⁸ Moral scepticism is addressed similarly: as *S* thinks of

⁷ Prima facie justification is justification is absence of defeaters.

⁸ Notably, Silins (2007) and McGrath (2013b) reject this claim. They object that even if the justification for S's belief that P isn't based on S's independent justification for believing that no sceptical scenario is instantiated, the justification for S's belief that P still requires – as the satisfaction of a mere *necessary* condition – S to have independent justification for believing that certain sceptical scenarios aren't instantiated. If Silins and McGrath are right, the phenomenal conservative's response to the sceptic fails. Moretti (2014) fears that this response may be ineffective for an independent reason: the justifying force of S's seeming that P may prove ultimately irrelevant for S's epistemic evaluations because it may be *overridden* by the independent and possibly divergent justifying force of S's *introspective belief* that she has a seeming that P.

certain kinds of situations, some things will seem to *S* morally right or wrong. If (PC) holds true, in absence of defeaters, this will thereby give *S* some justification for her moral beliefs (cf. Huemer 2005). Finally, (PC) looks attractive because it provides a *unified* account of non-inferential justification of beliefs of different types. (For further remarks about (PC)'s advantages see Tucker 2013b: §2.) Huemer has also adduced elaborated philosophical arguments in defence (PC), which I review in §3.

Huemer (2013a: 338) proposes to extend (PC) to include an account of *inferential* justification. According to this proposal, there are ordinary seemings and *inferential* seemings. The latter occur in inference and are to the effect that it seems to *S* that a conclusion *Q* must be true or probable in light of something else *P* that *S* believes – i.e. the premises. *S* has inferential justification for believing that Q – according to this view – only if *S* has both the inferential seeming and justification for *P*. The viability of this account is controversial even among (PC)'s supporters. For discussion see Huemer (2013a, 2014), Markie (2013), McGrath (2013a) and Tooley (2013).

This is how the remainder of the paper is organised: §2 focuses on the nature of seemings, §3 reviews arguments in support of (PC), and §4 reviews problems and criticism of (PC).

2. The nature of seemings

Philosophers have taken at least *four* different views about the nature of seemings. According to the *belief* view – endorsed for instance by Lycan (1998: 165-66), Hanna (2011) and somewhat Swinburne (2001: 141-42) – seemings are spontaneous non-inferential beliefs. Evidence for this view is for instance that when people say 'it seems to me that...' they often mean 'I hesitantly *believe* that...' A serious problem of this view is that it appears possible that a subject *S* could have a seeming that *P* without believing that *P*. Suppose for instance *S* is aware of having an optical illusion that *P*. *S* will have the appearance that *P* but won't believe – not even hesitantly – it. (Cf.

Huemer 2007. See also Hanna 2011's response.) This problem doesn't affect the *disposition* view, which identifies a seeming that *P* with a mere disposition or inclination to believe that *P* (see for instance Swinburne 2001: 141-42, Sosa 2007: 258-59, Rogers and Matheson 2011 and Werner 2014). The disposition view doesn't support (PC) because it is implausible that *S*'s mere inclination to believe (whether rightly or wrongly) that *P* could give *S* justification for believing that *P*. The disposition view is arguably false for independent reasons (cf. Huemer 2007, 2013 and Tolhurst 1998). First, it seems possible that *S* could be so convinced that her appearance that *P* is illusory that she may even lack the disposition to believe that *P*. Second, *S* could be disposed to believe a proposition that doesn't seem true to her (e.g. because of her wishful thinking). Third, it is intuitively true that *S*'s seeming that *P* can explain *non-trivially S*'s disposition to believe that *P*. If seemings *coincided* with dispositions to believe, this wouldn't be possible. (See Werner 2014 for counterarguments.)

An alternative conception of the nature of seemings, which Tucker (2013b) dubs *evidence-taking* view, holds that *S*'s having a seeming that *P* is the same as *S*'s believing or being disposed to believe that some mental state *M* of *S* is evidence for *P* (see Conee 2013 and Tooley 2013). On this view, for instance, it may seem to *S* that there is a tiger before her in the sense that *S* believes that her visual appearance of a yellow-brown coat striped with black before her is evidence that there is a tiger. The evidence-taking view doesn't seem to be affected by any of the problems discussed before. However, as well as the disposition view, it doesn't support (PC). For it seems false that *S*'s mere believing or being inclined to believe that she has evidence for *P* could give *S* justification for believing that *P* (cf. Conee 2013). One independent reason why the evidence-taking view looks implausible is that it seems possible that *S* could believe or tend to believe that her mental state *M* is evidence for *P* (for instance because of her wishful thinking) even if *P* doesn't really seem to be true to *S* (cf. Huemer 2013a).

Nowadays the most popular conception of the nature of seemings – at least among (PC)'s supporters – is the *experience* view. According to it, S's having a seeming that P coincides with S's having a sui generis experience⁹ provided with propositional content and unanalyzable in terms of belief (see for instance Bealer 2000, Pryor 2000, 2004, Huemer 2001, 2005, 2007, 2013a, Cullison 2010, Chudnoff 2011, Brogaard 2013,¹⁰ Lycan 2013, Skene 2013 and Tucker 2010, 2013b). According to this view, the experiences constituting seemings are essentially characterized by a distinctive phenomenology that makes them represent their contents assertively. This phenomenology can be described as the feeling of ascertaining that a given proposition is true, or the feeling of being directly presented with the truth of a proposition (cf. Huemer 2001: §4. Also see Tolhurst 1998 and Chudnoff 2011). Apparent perceptions, apparent memories, intellectual intuitions and introspective states would all be species of this broad type of experience.¹¹ This conception of seemings doesn't appear to be touched by the problems considered before that afflict rival the views. Furthermore, the experience view seems to support (PC) because it isn't implausible that (contentful) experiences could justify beliefs (cf. Tucker 2013b: 5). This view is not free from problems though. To mention some of them, it is controversial whether there is actually something like an assertive phenomenology. A recurring complaint is that the notion of assertive phenomenology can only be partly illuminated through analogies with linguistic phenomena but is actually unanalyzable. So it looks mysterious and suspect (cf. Conee 2013 and Tooley 2013.) A related criticism says – to put it crudely – that the mental states labeled with 'seemings' or 'appearances' are phenomena so disparate that it looks implausible they could belong

⁹ Some advocates of this view describe seemings as sui generis *propositional attitudes*. But this appears to be mere terminological difference.

¹⁰ Brogaard accepts the experience view in general but contends that certain seemings, which she calls *epistemic*, are beliefs.

¹¹ Advocates of the experience view don't agree on whether perceptual seemings just coincide with *sensations* of a particular type. Whereas Tolhurst (1998) and Huemer (2001) maintain that perceptual seemings are sensations, Bergmann (2013a), Brogaard (2013) and Tucker (2011, 2013b) deny it. Other contentious issues are whether seemings can be unconscious (see Bergmann 2013a for discussion), and whether there can be qualia-free seemings (see for instance Huemer 2001: 67, Tucker 2010, Huemer 2013a and Tooley 2013).

to *one* general type (cf. DePaul 2009 and Byerly 2012). For responses see Huemer (2009, 2013a and 2014).

3. Arguments in support of (PC)

Huemer has delivered at least *three* different arguments in support of (PC). The *epistemic rationality* argument (cf. Huemer 2001: 103-4) heavily relies on Foley (1993)'s conception of epistemic rationality. According to this conception, roughly, it is epistemically rational for *S* to do *X* if doing *X* would appear, from *S*'s standpoint, to be an effective way of satisfying the goal of believing the true and not believing the false. Suppose it seems to *S* that *P* and *S* has no reason for doubting that *P*. In this case, from *S*'s standpoint, believing that *P* would naturally appear to be an effective means of pursuing the goal of believing the true and avoid the false. Hence, on Foley's conception, *S*'s believing that *P* would be epistemically rational and thus – in agreement with (PC) – epistemically *justified* to some degree. For discussion see McGrath (2013a).

The *internal coherence* argument (see mainly Huemer 2006) roughly goes as follows: it looks a priori true – from an internalist viewpoint at least – that

(C) If propositions *P* and *Q* seem equally true to *S* and there is no defeater, it would be *irrational* for *S* to treat *P* and *Q* differently from a doxastic viewpoint (e.g. to believe only one proposition but not the other).

The best explanation of the truth of (C) adduces just (PC). Suppose in fact that (PC) is true. Then, if the antecedent of (C) is true, belief in P and belief in Q are *equally justified* for S. Thus it would be irrational for S to treat P and Q differently from a doxastic point of view. Hence the consequent of (C) is also true. Thus (C) true. Since the best explanation of (C) is given by (PC), (PC) must be true. Tucker (2013b) retorts that this argument isn't compelling because there is an equally good explanation of (C) that doesn't adduce (PC). In particular, one could explain the truth of (C) by contending that if the antecedent of (C) is true, S is (only) *rationally committed* to believing both Pand Q to the same extent. So the consequent of (C) and (C) itself are also true. This explanation doesn't appeal to (PC) because *S* can be rationally committed to believe *P* and *Q* even if *S* has no justification for believing either proposition.¹² For useful discussion see McGrath (2013a).

The self-defeat argument (see Huemer 2001 and especially 2007, and Skene 2013) aims to conclude, not just that (PC) is true, but rather that the belief that (PC) is false cannot be doxastically justified. The reasoning runs roughly as follows: (i) if S believed that P (where P stands for almost any proposition including the one that (PC) is false), S would do so on the basis of S's seeming that P, or on the basis of S's seeming that Q, where P has been inferred by S from Q. Furthermore, (ii) S's belief is doxastically justified only if *its basis* is a source of propositional justification. Therefore, (iii) if (PC) were false, S would have no justified belief that P for almost any P. Thus (iv) S would not even have a justified belief that (PC) is false. This argument is extremely controversial - even advocates of (PC) distance themselves from it (e.g. Tucker 2013b: 9 n22 and Lycan 2013). Critics have raised diverse objections to it. For example, DePoe (2011) contends that (i) is false because *direct acquaintance* is the appropriate basis for forming non-inferential beliefs. Tooley (2013) rejects (iii). Since he finds (PC) exceedingly permissive, he suggest replacing it with a restricted version (PCR) according to which only the seemings uncaused by other seemings – the *basic* seemings – are sources of non-inferential justification. Tooley suggests that basic seemings may justify, among many other propositions, (PCR) and thus the *negation* of (PC). Markie (2013) makes a similar objection. For further criticism see DePaul (2009) and Conee (2013). See Huemer (2009, 2011, 2013a and 2014) and Skene (2013) for responses.

4. Problems and criticism of (PC)

Some critics of (PC) suggest that (PC) shouldn't be accepted because it would permit crazy beliefs to be justified. For instance, Markie (2005) imagines the following possibility: when S sees a walnut tree, due to her brain malfunction, it just seems to S that (P) the walnut was planted on April 24,

¹² Rational commitment is a relation of mere coherence between doxastic attitudes (cf. Pryor 2004 and McGrath 2013a). Suppose for instance I believe *without justification* that I'm in London. Then, I'm rationally committed to believing that I'm not in Paris even if I have no justification for believing so.

1914. If (PC) is true, *S* will have some prima facie justification for believing *P*. But this looks counterintuitive. Examples like this have been taken to show that (PC) is excessively permissive (cf. Tooley 2013).¹³ Some also suggest that (PC) is unattractive because it could permit *dangerous* beliefs to be prima facie justified. Imagine for instance it seems to *S* that (*Q*) her religion is true and that she should kill everyone who doesn't believe in it; or that (*R*) cannibalism is morally good. If (PC) is true, *S* will have some prima facie justification for *Q* or *R* (cf. Littlejohn 2011 and Tooley 2013.) Huemer (2014: 4a) tries to play down the asserted consequences of thought experiments like these. He observes, for instance, that *S*'s *ordinary* background information would certainly defeat *S*'s non-inferential justification for propositions like *P*, *Q* and *R*, and that some of the adduced scenarios – e.g. Markie's walnut one – look so unfamiliar and weird that it is rather unclear they are actually possible.

Philosophically more interesting objections to (PC) hinge on the phenomenon of *cognitive penetration*. Let's say that a seeming of *S* is cognitively penetrated by a mental state of *S* whenever that mental state causes at least partly *S*'s seeming. Thus if *S*'s emotions, desires, beliefs, experiences or other seemings cause or contribute to cause a seeming of *S*, this seeming is cognitively penetrated by those mental states (cf. Tucker 2013b: 12). Cognitive penetration is useful because it can enhance our recognitional abilities (cf. Lyons 2011). For instance, the attested background beliefs of an expert birdwatcher can make her have a seeming that there is a *pine warbler* – rather than, say, a generic yellowish bird – when there is such a bird. Accordingly, if (PC) is true, the birdwatcher will have some prima facie justification for believing her seeming's content. This case of cognitive penetration doesn't raise difficulties to (PC), but others do. Let's call *bad cognitive penetration cases* those in which it is counterintuitive or at least controversial that *S* can have (even only) prima facie justification on the grounds of a seeming. These case typically correspond to situations in which a seeming that *P* of *S* is (partly) produced by a mental state *M* of *S*

¹³ A parallel concern is that (PC) is *untrustworthy* because it could lead subjects to justify a proposition and its negation. For discussion see Mizrahi (2013, 2014), Moretti (2013) and Piazza (2014).

that couldn't legitimately provide S with epistemic justification for believing P. For example, Mmay be a mere desire, an emotion, or an irrational belief (cf. Tucker 2013b: 3.2 and Huemer 2014: 4c). Suppose for example it seems to S that (P) the pebble in her hands is gold. Suppose that this happens because S desires the pebble to be gold, or because S has unjustified background belief about how gold looks like. If (PC) is true, S will have some prima facie justification for believing P, but this conclusion would strike many as counterintuitive.^{14,15}

Epistemologists have adduced the possibility of bad cognitive penetration to question (PC). See Markie (2006, 2013), Lyons (2011), Siegel (2012, 2013), Brogaard (2013), McGrath (2013a) and Steup (2013). Some have put forward restrained versions of (PC) that don't entail that seemings can prima facie justify belief in cases of bad cognitive penetration. See Brogaard (2013), Markie (2013) and McGrath (2013). Advocates of (PC), on the other hand, have attempted to explain away the intuition that badly penetrated seemings cannot prima facie justify their contents. Tucker (2010, 2011) suggests for instance that in cases of wishfully produced seemings, S does have seemingbased justification. What we actually perceive as problematic in these cases is - according to him that S is epistemically blameworthy for *wishfully* producing seemings, or that S's beliefs justified by wishfully generated seemings don't possess *warrant* – the property that turn a true belief into knowledge.¹⁶ (For discussion see Huemer 2013a, Markie 2013 and McGrath 2013a.) In a similar vein, Skene (2013) contends that those who adduce the possibility of wishfully produced seemings to question (PC) confuse evaluating S's beliefs based on her wishfully produced seemings, which are actually justified by those seemings, with evaluating S herself, who is actually irrational because of her wishful attitude. Other supporters of (PC) – prominently Lycan (2013) and Huemer (2013a, 2013b) – contend that even in case of bad cognitive penetration the subject S normally has prima

¹⁴ For diagnoses of what exactly would prevent S from having seeming-based justification in cases like this see Lyons (2011), Siegel (2012, 2013) and McGrath (2013a). ¹⁵ Tooley (2012, 352 c)

Tooley (2013: §5.2.1) argues that another variety of cases of cognitive penetration also raises trouble to (PC). Suppose S correctly *infers* Q from P, thereby acquiring an inferentially justified belief that Q. This inference will also produce in S a seeming that Q. If (PC) is true, S will thus have two justifications for Q: the inferential one plus the justification provided by her seeming that Q. So (PC) seems to commit us - in cases like this - to ascribing too much justification to our beliefs. For responses see Huemer (2013a) and Tucker (2013b). ¹⁶ For an alternative line of reply see also Tucker (2014).

facie seeming-based justification. Huemer suggests, for instance, that the cases of bad cognitive penetration are analogous to those in which *S* has *realistic hallucinations*, which are acknowledged to be evidential by the internalists.

Interesting objections to (PC) of quite a different sort are the Bayesian ones. See for example Schiffer (2004), Cohen (2005), Williamson (2005), Wright (2007) and especially White (2006). Most of these objections directly target Pryor (2000, 2004)'s *dogmatism* – a form of phenomenal conservatism about *perceptual* justification. Pryor characterises dogmatism as follows:

(DG) Whenever you have an experience of *P*'s being the case, you thereby have immediate (*prima facie*) justification for believing *P*. (2000: 532)

The expression 'Whenever you have an experience of *P*'s being the case' in (DG) can be replaced, presumably without loss of content, with 'Whenever it perceptually seems to you that *P*'. Immediate justification for *P* is roughly non-inferential justification¹⁷ – namely, justification for believing *P* that is not based on independent justification for believing other propositions.

Bayesianism is based on the assumption that rational confidence obeys the probability calculus and arguably provides the most successful formal account of inductive reasoning we have today. The Bayesian objections aim to show that (DG) is false or very implausible because it is inconsistent with the Bayesian account of how evidence rationally affects our credences. Let's consider the most discussed of these objections. Suppose E = `I have the seeming that this is a hand', P = `This is a hand', and F = `This is a fake hand' (where a fake hand is anything that isn't a hand though is visually indistinguishable from it). White (2006) shows that, given simple and apparently natural assumptions, on the Bayesian framework it holds true that $Pr_E(P) < Pr(\sim F)$.¹⁸ That is to say, once *E* is given, the probability of *P* is smaller than the probability that $\sim F$ had before *E* was given. White interprets this inequality as showing that

¹⁷ See Pryor (2005) for a more accurate characterization.

¹⁸ Where $\sim F$ means 'This is *not* a fake hand'.

(I) Whenever it seems to me that *P*, I'm somewhat rationally confident that *P* only if I was already more rationally confident that $\sim F$.

This is very close to say that whenever it seems to me that P, I have some justification for believing that P only if I already had stronger justification for believing that $\sim F$. From this, White concludes that (DG) is false because perceptual seeming-based justification is not immediate.

Most responses to White by supporters of (DG) fall within either of these categories: those that agree with White that *if* Bayesianism is true, *then* (DG) is false but propose revising Bayesianism to block the derivation of $Pr_E(P) < Pr(\sim F)$, and those that retort that Bayesianism and (DG) are in fact *compatible*. Importantly, the revisionary proposals aren't just *ad hoc*. They are typically introduced as means to resolve or cope with more general shortcomings of Bayesianism – e.g. its inability to provide states of *uncertainty* (or absence of evidence) and certain types of defeaters with adequate formalization (cf. Tucker 2013b: 4.3, 4.4 and Pryor 2013). Among the revisionary responses, Pryor (2007) suggests replacing the probability function with an original superadditive function; Weatherson (2007) proposes switching to imprecise probabilities and introduces a non-standard conditionalisation procedure; Jehle and Weatherson (2012) suggest replacing the probability function.¹⁹ Kung (2010) suggests re-interpreting the Bayesian formalism in a non-orthodox way.²⁰

Among the non-revisionary responses, Silins (2007) contends that White's argument confuses a mere necessary condition with a necessary *and basing condition*. In particular – Silins claims – (DG) would be false if it turned out that when it seems to me that *P*, I have some justification for *P only if* I have antecedent justification for $\sim F$ and this justification constitutes a basis of my justification for *P*. But White's inequality doesn't show that the necessary antecedent justification for $\sim F$ is also a basis of the justification for *P*. Quite the opposite – Wedgwood (2013) adds – that inequality is compatible with the possibility that it is the very fact that seemings can

¹⁹ Weatherson (2007) and Jehle and Weatherson (2012) respond to a formal argument that *parallels* White's. However, if the changes they propose were implemented, they would block the derivation of White's inequality too.

²⁰ On the alternative interpretation, White's inequality is still derivable but becomes compatible with (DG).

justify their contents that provides a basis of the antecedent justification for $\sim F$ (also cf. Pryor 2013). Moretti (2014), on the other hand, emphasises that what the expression $Pr_E(P) < Pr(\sim F)$ actually says is that

(I*) Whenever *I* believe with certainty that (*E*) *I* have the seeming that *P*, I'm somewhat rationally confident that *P* only if I was already more rationally confident that $\sim F$.

We can re-phrase (I*) without problems into

(I) Whenever *it seems to me that P*, I'm somewhat rationally confident that *P* only if I was already more rationally confident that $\sim F$,

which is crucial to get to White's conclusion, only if my *seeming* that P and my *introspective belief* that E have similar evidential features. But this is implausible, as the content of my seeming (the proposition that P) and the content of my introspective belief (the proposition that E) are about very different things and can entertain conflicting logical relations with the very same propositions.²¹

Pryor (2013) suggests that the Bayesian objections target not only (DG) but also a modest and widely indorsed thesis dubbed by him *credulism*. Consider a proposition *P*. Let $\sim U$ be the negation of a potential undermining defeater *U* of *S*'s seeming-based justification for *P*.²² Credulism holds that *S*'s seeming-based justification for *P* is *not* based on *S*'s antecedent justification for *at least some* $\sim U$ s. Pryor explores different ways to neutralise these apparent incompatibilities by exposing substantive epistemological assumptions concealed within the Bayesian formalism.

Let's consider a last type of objection made against (PC). Some authors contend that its merely seeming to a subject *S* that *P* cannot suffice to provide *S* with even some prima facie justification for believing *P*. In addition – according to them – *S* must possess *metajustification*; that is to say, justification for thinking that her seeming is a reliable indicator of the truth. For if *S* lacked

²¹ In particular, Moretti (2014: §5) argues that what blocks White's argument is the fact that whereas *E* is inferable from *F*, *P* is incompatible with *F*.

Moretti (2014: §5) argues that this blocks White's argument.

²² In other words, U is evidence that S's appearance that P is unreliable or otherwise defective as a source of information.

metajustification, even if *S*'s seeming-based belief that *P* proved true, this would at best be an *accident* from *S*'s viewpoint, which is incompatible with *S* having justification for that belief. (Cf. Bonjour 2004, Bergmann 2013 and Steup 2013.) As a response, Steup (2013) proposes replacing (PC) with a variant according to which if it seems to *S* that *P* and *S* has memory data that support the reliability of her seeming that *P*, *S* has some prima facie justification for believing that *P*. Huemer (2013a) fears, however, that the metajustification requirement could yield scepticism. For if we think that seeming-based justifications of *any* kind, including metajustification itself, which would probably produce a vicious infinite regress. This fear has been articulated by Bergmann (2013) into a *dilemma* for (PC),²³ according to which the phenomenal conservative either will insist that seemings need no metajustification, with the consequence that no seeming justifies anything, or will admit that they need metajustification, which would start a vicious infinite regress eventually leading to scepticism. For a defence of the claim that seeming-based justification requires no metajustification and a response to Bergmann's dilemma see for instance Rogers and Matheson (2011) and Huemer (2013a).

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²³ This is a special version of Bergmann (2006)'s dilemma for the internalist in general.

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