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INTERNALISTIC FOUNDATIONALISM AND THE JUSTIFICATION OF MEMORY BELIEF

ABSTRACT. In this paper I argue that internalistic foundationalist theories of the justification of memory belief are inadequate. Taking a discussion of John Pollock as a starting point, I argue against any theory that requires a memory belief to be based on a phenomenal state in order to be justified. I then consider another version of internalistic foundationalism and claim that it, too, is open to important objections. Finally, I note that both varieties of foundationalism fail to account for the epistemic status of our justified nonoccurrent beliefs, and hence are drastically incomplete.

The significance of memory's role in our knowledge of the world can hardly be overstated. At any given time, a normal adult knows a great deal, even though she is then conscious of only a few scattered thoughts. One will come to know a proposition, store it in long-term memory for weeks, months, or years, and then, on a moment's notice, occurrently know it once again. Even cases in which one initially comes to know a proposition, this new knowledge will frequently be contingent on an inference involving propositions that one has known for some time.

Given the importance of memory for our knowledge of things both past and present, it is surprising how little has been written on it in the epistemological literature. Furthermore, I believe that much of what has been written is fundamentally wrong. I want to do something to correct both of these problems. In this paper, I will take some recent work by John Pollock as an example of the kind of view that I think is mistaken. Having laid out this position, which is a variety of internalistic foundationalism,¹ I will then argue that it is open to significant objections. In light of these difficulties, the foundationalist might be tempted to alter his position. Anticipating this, I will then argue that the most plausible foundationalist alternative fares no better. Finally, I will attempt to establish the claim that even if either foundationalist theory were accurate as far as it goes, it is a drastically incomplete theory of the justification of memory belief.

1. POLLOCK'S ACCOUNT OF THE JUSTIFICATION OF
MEMORY BELIEF²

In this section, I will expound certain elements of John Pollock's account of the justification of memory belief. However, as I suggested above, it is not my primary purpose here to explore the details of his view. Rather, I want to discuss a general version of foundationalism with respect to memory beliefs and I am using Pollock's view as a place to begin.

Pollock's discussion of memory occurs in the midst of a discussion of epistemic ascent or how justification gets transferred from belief to belief. On Pollock's view, a belief is justified if it is based on a 'prima facie reason', i.e., a reason sufficient to justify the belief in the absence of defeaters. Forming a belief on the basis of a reason is 'reasoning' and, according to Pollock, it is in virtue of reasoning that justification gets transferred from one belief to another.

A potential problem arises, however, when one realizes that reasoning is an occurrent process and hence that only occurrent beliefs can enter into such inferences. The problem is this: suppose that at t₁, I occurrently believe that P and that leads me to believe occurrently that Q. Later, at t₂, I recall Q and reason from it to R. If the case is typical, I will not rehearse my inference from P to Q; I will simply recall Q and go from there. So the question is: On what is my justification for believing that Q based at t₂? Pollock notes that an answer frequently proffered by foundationalists is that my justification at t₂ is simply the reason that I had for forming the belief at t₁. But this seems unsatisfactory for a couple of reasons. First, Pollock claims, we sometimes 'remember' incorrectly, and so we might seem to remember Q even though we never knew that Q and so can't really 'remember' it. In such a case, we are surely justified, Pollock thinks, even if the reason that we originally had for believing Q was not a good one. Another reason for doubting the foundationalist's initial answer can be found in some recent writings by Gilbert Harman.³ Harman notes that people often forget the original grounds of their beliefs even though, intuitively, these beliefs remain justified (for instance, I take myself to be justified in believing that my first-grade teacher's name was Mrs. McDonald, but I don't have any idea how I came by this belief, nor do I take myself to now have any other evidence or it). It is therefore hard to see how the original grounds, which the believer no longer possesses, could be justifying her belief now.

The problem can be solved, Pollock contends, by seeing that memory is a justification-conferring process. If S seems to remember that P, S has a *prima facie* reason to believe that P. So if she bases her belief that P on her state of seeming to remember that P, and P is undefeated for her, then she is justified in believing it. Memory should be seen as a process that is epistemologically parallel to perception. In a standard case of perceptual belief, the subject is 'appeared to' in a certain way and, on the basis of that appearance, comes to a belief about the external world. Similarly, when one remembers that P, one has a recollection and, on the basis of that phenomenal state, one comes to believe that P. Both faculties are justification conferring; i.e., beliefs formed on the basis of the appropriate nondoxastic states and produced by those processes are justified if undefeated.

At this juncture, one will want to know more about what it is to 'seem to remember' a proposition. I will let Pollock speak for himself:

The viability of such an account turns in part on whether there is such a thing as 'seeming to remember' that is analogous to being appeared to in some way or other. Some philosophers have denied that there is such a state, but it is not too hard to see that they are wrong. It is possible to hold the same belief on the basis of memory, or perception or for no reason at all, and when we hold the belief we can tell introspectively which is the case. In other words, we can discriminate between memory beliefs and other beliefs. But to say this is just to say that memory has an introspectively distinguishable mental characteristic. The mental state so characterized is the state of 'seeming to remember.' This can be made clearer by considering an example. Imagine that you are trying to quote the first line of a poem. It is on the tip of your tongue, but you cannot quite get it. Finally, a friend tires of watching you squirm and tells you the line. This can have two possible effects. It may jog your memory so that the line comes flooding back and you now remember it clearly. Alternatively, it may fail to jog your memory. You believe your friend when he tells you how the lines goes [sic], but you still do not remember it. In either case you come to have the same occurrent belief about the line, but there is a clear introspectible difference between the two cases. The difference is precisely that in the first case you come to be in the state of seeming to remember that the line goes that way, whereas in the second case you have no such recollection. Cases like this show that there is such a psychological state as seeming to remember.⁴

In his earlier book *Knowledge and Justification*, Pollock proposes to call the phenomenal state of 'seeming to remember that P', 'recalling that P'. Such a state can then be called a 'recollection'. It will be handy for me to sometimes use this older terminology.

Pollock's view then boils down to this:

S's memory belief that P is justified at t iff at t, S seems to remember that P, bases her belief on this phenomenological state, and possesses no defeater for her belief that P.

My exposition of Pollock's account of mnemonic justification will be incomplete until I say a few words about the notion of epistemic defeat. A memory belief that is based on the phenomenological state of seeming to remember is only *prima facie* justified; its justification can be overridden by other things that one believes. On Pollock's view, only a proposition that is currently in working memory can be a candidate defeater. A potentially defeating proposition stored in long-term memory is irrelevant to the justificatory status of what I am now believing, even if I could retrieve this belief with relative ease.⁵ Although I think that Pollock's view of what can defeat justification is far too restrictive, I will not be concerned with this feature of his account in what follows.

2. FOUNDATIONALIST THEORIES OF THE JUSTIFICATION OF MEMORY BELIEF

As I said in the first section, I am not concerned primarily with Pollock's particular theory of the justification of memory belief. Rather, I'm also interested in a general kind of theory that can be picked out via two common features. The first has to do with the 'felt' quality of mnemonic experience, or in Pollock's terminology the experience of 'recalling'. According to Pollock and others, there is a certain kind of experience one has with memory beliefs that marks such beliefs as memory beliefs. Now the important point here is that this experiential element does significant epistemological work. For instance, as we have seen, Pollock thinks that in the absence of defeat, this experiential element of a memory belief is sufficient to justify it. Loosely, then, the first feature of the theory of mnemonic justification that interests me here is the dual claim that (i) all occurrent memory beliefs are accompanied by what Pollock calls a 'recollection' and (ii) this experiential state is necessary for the *prima facie* justification of an occurrent memory belief. The second feature of the Pollockian theory that is even more common than the first is its foundationalist structure. According to such theories, occurrent memory beliefs need not be supported by evidence or argument in order to be justified; occurrent memory beliefs are epistemically basic or immediately *prima facie* justified. I will call any

theory that includes only the second of these features 'simple foundationalism' (or 'SF' for short); a theory which incorporates both of these elements I will call 'phenomenalistic foundationalism' ('PF').⁶

Both PF and SF are varieties of epistemic internalism. As I am construing them, internalistic theories maintain that the only states relevant to the epistemic evaluation of a belief are states that are 'internal' to the believer in question. But what is meant by 'internal' in this context? Appropriately enough, the sense of internal that is relevant here is epistemic. It isn't enough that the justification be physically internal to the subject; nor is it sufficient that it be psychologically internal. For there are plenty of psychological states and processes that are not epistemically internal. To be epistemically internal a state or process must be such that the subject who has it is aware of having it or could become aware of it on reflection. To which kinds of states do we have such access? Psychological states – things like beliefs, desires, emotions, phenomenal states, and the like; these are the objects of introspection.⁷ An internalistic theory, then, is one that requires the justification of a belief to be epistemically internal. SF is a limiting case of internalism; for it doesn't require that there be an accessible justification, since it doesn't require a justification at all. However, since every memory belief is *prima facie* justified, it places no restrictions on conditions external to the subject's perspective and so it falls under the rubric of internalism.

It should be noted that, like Pollock's particular brand of foundationalism, PF is structurally very much like standard theories of perceptual knowledge. In both cases, there is a nondoxastic phenomenal state that serves as the justificatory basis of the belief in question; and a belief of the relevant sort is justified if there is the right kind of match between the properties represented in the nondoxastic state and the content of the belief. For example, if I seem to see (remember) a red wagon and believe on this basis that there is (was) a red wagon, then my belief is *prima facie* justified; on the other hand, if, on the basis of this same nondoxastic state, I believe that it is (was) raining, the resulting belief isn't justified. The *prima facie* justification of either sort of belief can be defeated in two ways: either by my having evidence that the particular belief I formed is false, or else by my having reason to believe that the relevant cognitive process (i.e., vision or memory) is unreliable in the circumstances in which it is operating.⁸ Hence one who accepts PF will tend to think that there are significant parallels

between the justification of memory belief and the justification of perceptual belief. On the other hand, the proponent of SF will likely insist that such an analogy does not hold, i.e., that memory beliefs are justified without being grounded in phenomenal states, and that in this respect memory and perception are importantly different.⁹

Presently, I will argue that both PF and SF are false. But before I get to that, let me bring out the considerable initial attractiveness of foundationalism for memory beliefs in general, and of PF in particular. There are a great many instances of justified memory belief for which one seems to have no good evidence. For example, ask yourself what the name of your first-grade teacher was. Chances are you know the answer to this question, but you can't remember any bit of evidence that would serve to justify your belief. It might be true that, being an epistemic sophisticate, you can construct a justificatory argument. For example, you might defend yourself as follows:

- (P1) This belief has *that* feel.
- (P2) Beliefs with *that* kind of feel are highly likely to be true.
- (C) So, this belief is probably true.¹⁰

But this doesn't really solve the problem for two reasons. First, an argument is only as good as its premises, and one will want to know what sort of justification you have for P2; it is very likely that any justification you might have will itself depend on memory beliefs and hence be infested with epistemic circularity. And even if you are clever enough to avoid this pitfall (which would make you the most clever epistemologist ever), you still must grant that this justificatory argument is not the sort that just anybody can produce; and so if the justification of memory belief is dependent on such reasoning, a great percentage of the adult population will have fewer justified beliefs than we might have thought. Therefore, if such beliefs are generally justified, that justification must not depend on being able to construct evidence or arguments in support of the belief. PF and SF are both able to account for our intuitions that such cases of memory belief are indeed justified. So it is not surprising that there are a great many epistemologists who advocate PF, SF, or at least the phenomenalistic feature of PF. Those philosophers who advocate one of these positions, or something much like them, include Pollock, Richard Feldman, Robert Audi, Alvin Plantinga, George Pappas, and Laurence Bonjour.¹¹

In what follows, I shall try to show that both PF and SF are false. I

will argue that PF is wrong by showing that the phenomenalist features of memory belief can't do the epistemological work that PF assigns to them. I will then suppose that the friend of PF will be inclined to fall back on simple foundationalism, and so I will seek to show that SF is wrong also.

3. PROBLEMS WITH PHENOMENALISTIC FOUNDATIONALISM

In this section, I will present three different, although somewhat related, objections to PF. Since Pollock's view is a paradigmatic instance of PF, I will focus on it. The objections that we will consider are, it seems to me, sufficient for rejecting the theory.

Objection 1. I am willing to grant Pollock the point his poetry example is supposed to demonstrate, viz., that there is something phenomenologically distinctive about certain memory states. However, while Pollock has shown that there is a difference between merely believing a proposition and recalling it, the poetry example certainly hasn't indicated that every justified memory belief carries with it a distinct phenomenological state. And it is precisely this claim that is both essential for PF and yet quite implausible. Consider the following kind of example. You and I are working in our shared office. I am trying to plan our next committee meeting, so I ask you, 'Do you teach at noon on Wednesdays?'. Quickly, you take your nose out of your book just long enough to respond, 'No, I don't'. In such a case you have a memory belief with the content 'I don't teach on Wednesdays'. But your attention has not been focused entirely on my question. Instead, you have paid me just enough attention to answer me properly, and spent the rest of your attentional capacity puzzling over Bonjour's notion of the 'doxastic presumption'. Because of the limited attention that you give my question, you attend to your memory belief, but there is a significant sense in which you aren't really *aware* of it. This, I take it, is an example in which one's memory belief fails to have the kind of phenomenological properties experienced by the subject in Pollock's example.¹²

That one can have an occurrent memory without having a recollection is brought out nicely in a well-known example by C. B. Martin and Max Deutscher in their article 'Remembering'.¹³ They describe a case in which a painter images a scene and paints it. It turns out that the scene is a very good representation of an area in which the painter

lived as a child. However, when this is pointed out to him, the painter responds by denying that he was remembering and asserting that he was instead imagining. Now, one may surely stipulate that this is a case in which the painter is indeed remembering the scene but not 'seeming to remember' it, in Pollock's sense. Such a stipulation would not violate either conceptual or psychological possibilities. It must be granted that this isn't a case in which one believes that P, but doesn't recall it.¹⁴ Nevertheless, it does effectively show that one can have an occurrent memory which one doesn't recognize as a memory. And Pollock seems to be committed to denying that.

So the first reason to reject Pollock's theory, or any version of PF, is that it requires that a memory belief be accompanied by a particular kind of phenomenal state if it is to be justified; however, there are clear cases of justified memory belief that do not come with the appropriate state of 'seeming to remember'.

Objection 2. A second objection to Pollock's view has to do with its compatibility with the basing-relation requirement. In his book *Contemporary Theories of Knowledge*, Pollock argues, persuasively to my mind, that positive coherence theories of justification are doomed to failure because they can't adequately account for the crucial epistemological distinction between justifiable belief and justified belief. The former sort of belief requires that the subject have an adequate justification, but not that the belief be held in light of the justification. To have *justified* belief, however, one must have adequate reason for believing as one does and one must base one's belief on this reason. Although Pollock doesn't say much about just what this basing-relation comes to, he does claim that it is "in some loose sense a causal relation".¹⁵ What is perfectly clear, however, is that Pollock is committed to the thesis that a given state can only justify a belief if that belief is based (in some causal way) on the justifying state.

So Pollock is committed to the view that recalling that P can serve as a reason for believing that P only if the belief that P is based on the phenomenal state. But consider now a case in which a memory belief has an unquestionable phenomenological feel. Is it clear that the belief is based on (i.e., caused by) the state of recollection? It surely isn't clear to me. Introspectively, I generally don't notice a temporal succession between my having a recollection and my having the belief, even when I am looking for one. It all just crashes through at once. Now, it is

certainly true that introspection can be unreliable as a means of checking on one's psychological processes; so I am not making the strong claim that this *shows* that recollection isn't typically a causal ground of belief. However, the onus of proof would surely seem to be on one who is claiming that introspection is misleading us in this case. And Pollock hasn't offered any evidence for this.

Consider the following possibility. Suppose that the feel of recollection is generated by the belief's being held in working memory. The 'feel' accompanies the belief's becoming occurrent, but plays no causal role in activating it. In such a case the phenomenological characteristics of the belief might nevertheless act as a sign which signifies the working of the mnemonic, as opposed to say the perceptual, process. Would Pollock be willing to argue that creatures with that kind of cognitive makeup do not have justified memory beliefs? Would he come to the same conclusion if it turned out, as I think it might, that humans are such creatures?

Objection 3. A final objection to Pollock's foundationalism is that it is in danger of exhibiting a rather severe form of circularity. As I mentioned above, I think that it is plausible that when one introspects the phenomenal state accompanying a memory belief, what one introspects is the effect of that belief's being accessed from long-term memory and utilized in working memory. I also claimed that it is reasonable to suppose that the resulting memory belief is not caused by or based upon one's recalling it. In what follows, however, I will suppose that I am wrong about this, and that generally a memory belief will be based on a state of recollection. Nevertheless, a problem arises for the friend of PF. For one's recollection will undoubtedly be caused in part by the stored belief that is being recalled. But if the state of recollecting that P has as a part of its cause one's belief that P, then how can the former be the reason for the latter? The belief would ultimately have itself as its cause, and, besides being epistemologically embarrassing, that is impossible.

It must be admitted that some of the above difficulty is generated by equivocating on the word 'belief'. There are two relevant distinctions that need to be made with respect to belief. First, there is the philosopher's occurrent vs. dispositional belief dichotomy; and, second, there is the psychologist's division between activated and unactivated belief states. A belief is occurrent at *t* iff it is conscious at *t*. On the other

hand, S's belief that P is dispositional at t iff at t, S believes that P and P is not occurrent.¹⁶ It is much harder to give a quick characterization of the activated/unactivated distinction. On certain views of the nature of memory, beliefs in long-term memory are accessed via chains of activation.¹⁷ Only beliefs that are activated can be used in inference. The significant point for our purposes is that one shouldn't assume that every activated belief is occurrent; for a belief to be activated is not for it to be conscious. Now, generally, a belief that P in long-term memory is dispositional and unactivated; but if one does a memory search, one may seem to remember that P, and the belief that P will then become activated and occurrent. So this really isn't an instance of a metaphysically problematic self-caused cause; for the occurrent belief might be taken to be distinct from the dispositional belief in which case we simply have one token believing (indirectly) causing another. Alternatively, we might want to say that there is simply one token belief involved in this case, but claim that the dispositional belief causes the state of recollection which in turn causes the belief to become occurrent. Thus, on this interpretation, there is a single belief that simply undergoes a change. So there is no metaphysical embarrassment once one makes the appropriate distinctions.

Nevertheless, the epistemological embarrassment persists. For either the dispositional belief is the same token belief as the occurrent belief or it is not. Suppose that it is: then the occurrent belief is justified via a nondoxastic state that is caused (we are supposing for the sake of argument) by the very belief itself. But surely that is very much like believing A because one believes that B, and believing that B because one believes C, and believing that C because one believes that A. That is, one has a significant circularity problem.

On the other hand, suppose that the dispositional and occurrent beliefs are distinct tokens; then there is no circularity. However, in such a case it is quite hard to see how the occurrent belief could be thought of as immediately justified. For if the nondoxastic state is caused by a belief state, and if the subject wouldn't have the occurrent belief were it not for the dispositional belief, then surely the occurrent belief is importantly based on the dispositional belief. And if that is so, then the epistemic evaluation of the occurrent belief is dependent on the justificatory status of the dispositional belief.

The foundationalist might respond that since the dispositional belief is only the indirect cause of the occurrent belief (the nondoxastic state

is the direct cause), the latter isn't based on the former in any epistemologically important way. But surely this response doesn't hold much water. For any foundationalist theory will entail that, *ceteris paribus*, if one infers P from Q and Q from R, the epistemic status of R is relevant to the epistemic status of P even though R is only the indirect cause of P. Now the foundationalist might reply to this that there is an important difference: in the case of the twofold inference, the mediating state is a belief with propositional content and a justificatory status, but in cases of the sort with which we are concerned, the mediating state is a nondoxastic phenomenal state which has no justificatory status at all. So there is no transfer of epistemic status from the indirect cause to the direct cause to the effect since the direct cause has no status to transfer.

I believe that this response is inadequate as well. For surely the phenomenal state that Pollock and company have in mind, the state of recollection, has some kind of representational content even if it has no propositional content. (Although the fact that Pollock calls such a state a recollection that P seems to entail that it has propositional, and not merely representational, content.) And it has the representational content it does because of the propositional (and representational) content of the dispositional belief upon which it is based. And the occurrent belief has its propositional (representational) content because the nondoxastic state upon which it is based has the content that it does. Given the fundamental dependence of the occurrent belief on the dispositional belief, the latter must surely be justificatorily relevant to the former. So I conclude that if the dispositional belief that, via a phenomenal state, gives rise to an occurrent, ostensible memory belief is a distinct token from the occurrent belief, then it is justificatorily relevant to the occurrent belief and so this new belief can't be immediately justified as PF requires.

To sum up, I believe that the three objections discussed in this section give us very good reason for thinking that the phenomenological features of memory belief, such as they are, are not necessary for justification.

4. OBJECTIONS TO SIMPLE FOUNDATIONALISM

The view that I want to have a look at now is simple foundationalism. According to this position, memory beliefs are immediately justified; that is, a mnemonic belief is justified provided that it is not defeated. Whereas PF explains the justification of such beliefs via the state of recollection, simple foundationalism simply claims that any occurrent, apparent memory belief is justified if undefeated. In order to get at the heart of this position, we should make clear just what it is for a belief to be immediately justified. It is to this that we now turn.

There are two features that tend to distinguish foundationalist theories. The first is that there is a privileged class of beliefs. Very generally, these beliefs are such that at least a part of their justification is independent of other beliefs the agent holds. The strongest foundationalist theories demand that this class of beliefs be infallible, while the weakest maintain that such beliefs still require some support from other beliefs in order to be justified. A moderate foundationalism allows immediately justified beliefs to be fallible, but declares that such beliefs are justified even if they get no further support from the rest of the doxastic system; it is required only that these beliefs not be defeated by other beliefs. In this paper, I will understand PF theories as versions of moderate foundationalism.

The second earmark of foundationalism is less important for our concerns. This is the doctrine that the justification of any belief that is not immediately justified (that is, any mediately justified belief) ultimately depends on beliefs that are immediately justified. This is what gives foundationalism its characteristic structure.

A question of vital concern for us here is: What is it for a belief to be immediately justified? Let me make sure that the question is clear. I'm *not* asking for an analysis of *justification*, but rather an analysis of *immediate*. What does it take for a belief to be immediately justified? Well, an obvious way to begin is to say that a belief is immediately justified iff it is justified and its justification is not mediated by anything else. To say that its justification isn't mediated by anything else is just to say that its justification is not transferred to it via some other justified state. But what other sorts of states can transfer¹⁸ justification? Belief states, of course. So we end up then with:

[IJ]: S is immediately prima facie justified in believing that p at t

iff at t , S is prima facie justified in believing that P and there is no other belief Q such that P 's justification is transferred from Q .

It should be noted that other beliefs are relevant to the justification of an immediately justified belief in a negative way. That is, [IJ] doesn't rule out the very real possibility that other beliefs that S holds will knock out S 's prima facie, immediate justification for P . It only requires that the P 's prima facie justification doesn't depend on positive support from other beliefs.

We shall at last be in a position to evaluate the claim of SF after we've been more precise about what SF says. Let's understand it as follows:

[SF]: Any occurrent, ostensible memory belief is immediately prima facie justified.

Two points need clarification. First, let me explain why I say 'ostensible memory belief'. According to many people's ears, P can't be a memory belief of S at t unless S has believed it previous to t . However, it is clear that people sometimes have a belief 'come to them' as a memory belief does, but which they have not previously held. And the foundationalist wants her theory to cover such cases. So an ostensible memory belief is a belief that the subject believes (or would believe on a moment's reflection) to be a memory belief, whether it really is a memory belief. The second point I wish to clarify is my inclusion of the parenthetical phrase 'prima facie'. [SF] does not say that the immediate justification of memory beliefs is indefeasible. Rather, it says only that, in the absence of defeating circumstances, such beliefs are justified.

Finally, we are in a position to consider the primary issue of this section: How plausible is SF? In order to answer this, I will have us consider a couple of cases of the sort of memory belief that the typical SF theorist will claim to be justified. These cases will bring to light the mortal wounds of SF.

Suppose that a certain person, Patty, is about to write a check, but before she does she tries to remember her present bank-balance; quickly, she comes to occurrently believe that she has \$101 in her account. She knows of no reason to think that this is wrong and so SF will grant that she is justified in believing that her balance is \$101. And given the rather sketchy details of this case, I think that most of the

rest of us would be willing to grant, albeit somewhat tentatively, that Patty is justified in believing as she does.

But now let's add more to the story. Suppose that balancing a check-book has never been a simple task for Patty; in fact, she has found that her first effort is nearly always mistaken. Sometimes, however, she just doesn't care enough to go through the tedium of checking her figures. But Patty is an optimistic person and on most occasions she is convinced that she has the right answer, even though it is extremely unlikely that she does. Furthermore, if she later discovers her error, as occasionally happens, she is confident that the situation was but a 'fluke'. Now let's say that the night before Patty writes her check she has just finished balancing her checkbook without checking it, and she comes to believe that she has \$101 in her account.

The question of importance now is: Are we still willing to say that the occurrent belief that Patty has before she writes her check is justified? I think that the answer here is clearly no. However, as the case is described, the SF will have to say that it is. For Patty doesn't possess a defeater for her belief since she doesn't believe that she is an ineffective check-balancer. Now to make it beyond doubt that Patty has no defeater, we can add to the case that Patty doesn't remember many of those various cases in which she later discovered that she made an error; so her doxastic system contains neither a belief about her being a generally unreliable check-balancer nor an inordinate number of beliefs about finding that she has made a mistake in this domain.

Suppose we now compare the case as I have just filled it out with a similar case in which the person, Renae, is an accomplished accountant; for Renae there are fewer tasks more trivial than balancing her check-book. Now Renae balances her book and, as is typical, gets the right answer. The next day before writing a check, Renae tries to recall her balance. She realizes that the answer is \$101. Now I take it that Renae is clearly justified in believing as she does.

So why do we think that Renae is justified and Patty isn't? One possible answer is that Renae's belief is quite likely to be true, whereas Patty's is almost certainly false. And since justification is generally thought to have something to do with truth conducivity, this will explain the difference in the cases. While I have a deep sympathy with this response, there are two reasons why I don't want to dwell on it here. First, as I said in Section 2, the philosopher who accepts SF is committed to internalism. But considerations of truth and reliability are external

considerations if anything is; so the foundationalist can't appeal to them without ceasing to be an internalist and giving up SF. Second, it is surely the case that any philosopher who accepts either of these views realizes that it will often countenance beliefs that are not at all likely to be true; hence whatever notion of justification internalistic foundationalists have in mind, it must be such that a belief can be justified and not likely to be true.

While this reliabilist response is not available to the friend of SF, it does bring into the open a crucial issue about which I have heretofore been silent. It is now something of a truism that there are multiple senses of epistemic justification. Thus, in a discussion such as this, it is important to have some idea of which concept is at issue.

Obviously, SF (as well as PF) is a non-starter as a theory of that which turns true belief into knowledge (even if we forget Gettier examples); for such a notion has to entail that the belief be held in a truth-conducive way, and SF clearly has no such entailment.¹⁹ In an important paper, William Alston has argued that there are two primary concepts of epistemic justification.²⁰ The first, which he labels the 'evaluative' concept, is essentially a truth-related notion. Thus, we may think of it as in the same family as the one mentioned above.²¹ Alston dubs the alternative concept the 'deontological concept' of justification. What is essential to this concept is epistemic permissibility.²² Thus, on this view, one is justified in believing that P iff one's believing P as one does involves no violation of epistemic duty. Thus, epistemic blamelessness and responsibility are also essential to this notion of justification.²³

I believe that SF is best construed along deontological or responsibilist lines. John Pollock, for example, is explicitly concerned with epistemic permissibility and sees the notion of justification that concerns him as 'reason-guiding'.²⁴ So construed, SF is an initially attractive theory. For it is *prima facie* plausible to suppose that someone who seems to remember that P and knows of nothing that tells against her belief is within her epistemic rights in believing as she does. She is believing in a responsible manner, and so her belief must be permissible and, in a sense, justified. Therefore, I will interpret SF as an account of the deontological or responsibilist concept of justification.

Armed with the above bit of meta-theory, the simple foundationalist can offer the following objection to what I have said about Patty: 'Surely, one who has an ostensible memory belief that P and who now knows of no defeaters for P, is not being epistemically irresponsible in

believing that P. Thus, if we firmly keep in mind that (a) Patty has an ostensible memory that P, and (b) Patty now knows of no good reason to doubt this ostensible memory, then we should not think that she is unjustified in her belief. She is doing all that we can expect of her and so, contrary to your claim, SF gets this case right'.

I will grant that there is something to this objection; nevertheless, we will be able to see in just moment that the sense in which Patty is justified is not of much epistemological importance. Let me explain.

I said that I will grant that there is something to this objection; however, I will not grant that Patty's belief is deontologically justified. Consider again the details of her case. Patty frequently makes mistakes in balancing her checkbook, but yet she never notices this. And even though she is terrifically unreliable at this task, she is an optimist; and on those times when she doesn't check her work, she believes that she has balanced her book correctly. Of course, like the rest of us, Patty recognizes that she 'sometimes makes mistakes'; but while she can acknowledge this in the abstract, it never motivates her to doubt herself in any particular case. Now surely Patty ought to pay more attention to her mistakes; she ought to notice her errors and the frequency with which they occur. Of course, there may be excusing circumstances: Patty might be brain-damaged, or so very insecure that she simply can't bring herself to recognize her trivial mistakes. But since it is my case and I call the shots, let me stipulate that Patty has no such excuse. So when she initially comes to believe that her balance is \$101, after 'balancing' her book without checking her figures, Patty is unjustified in her belief. If this isn't obvious, suppose that when she forms the belief, she also occurrently believes as follows: perhaps I should check my figures; the very last time I balanced my book this hurriedly I was wildly off, so perhaps I am again. Let me further suppose that by the time that she recalls her belief about her balance, she has forgotten about what she discovered the last time she checked. Now given all of this, two things are clear: (i) Patty's occurrent, ostensible memory belief is undefeated and (ii) Patty's belief is deontologically unjustified. But according to SF, (i) and (ii) can't both be true; so, SF is false.

In case (ii) isn't clear to everyone, let's do what responsibilist epistemologists frequently enjoin us to do, viz., consider an analogous case in ethical theory. Suppose that a particular tyrant, call him 'Saddam', decides to rape and pillage a neighboring country. Saddam, we will suppose, is a very bad man; he is dishonest, absolutely ruthless, and

purely self-interested. Furthermore, Saddam wasn't always this way; as a child he had as much good in him as the next boy. However, as he grew he made a series of bad moral choices, and the more such decisions he made, the easier they became. Eventually, he came to have a bad character. And it is important that his present character is something over which he once had control, in that it is in virtue of the way he has acted in the past that he is now the man that he is. Now imagine a moral philosopher who comes to Saddam's defense vis-à-vis his brutalizing his neighbor. This philosopher points out that just before Saddam's decision to invade, his character made it impossible for him to do otherwise. Therefore, the moral theorist concludes, the invasion is not an action for which Saddam is to blame since he could do no other.

We wouldn't stand for this for a minute. We would point out that Saddam is responsible for his miserable moral character, and so any action that is necessitated by that character is one for which he is responsible as well. He is failing to satisfy his moral duty and he is culpable for it even though he is not now in a position to do otherwise. And the same goes, *mutatis mutandis*, for Patty. Given that she has the sort of epistemic character that she does, she can do no other than believe as she does. However, since her epistemic character is the result of her careless governance of her cognitive processes, she is properly the subject of epistemic blame for her belief.

Now this is the only sense in which Patty is justified in her belief: if we were to take a certain time-slice of Patty, from, say, t , the time just after she initially forms the belief about her balance, until t^* , when she recalls it the next day, we would find no epistemic wrongdoing. And when she has her memory impression at t^* , she is justified in this sense since there is at that moment nothing to indicate that this belief is false or unreliably held. But clearly this is not a critical sort of justification. For we don't think that the sense in which Saddam is justified is morally significant; so we shouldn't think that the sense in which Patty is justified is epistemically significant. When we are interested in whether a belief is deontologically justified, we are concerned with whether one believes it only as the result of violating some epistemic duty. And Patty clearly does; whether there is a certain time during which she holds the belief when she isn't doing anything wrong vis-à-vis the belief isn't of much interest.

So I conclude that SF is wrong even if it is construed along deontological lines. In a nutshell, this is so because whether one has a defeater

may well be determined by how one governs one's epistemic affairs; and if one lacks a defeater only because of epistemic negligence, the belief in question is not responsibly held and so not deontologically justified.

5. THE INCOMPLETENESS OF BOTH VARIETIES OF FOUNDATIONALISM

I have argued that both PF and SF are false as theories of the justification of memory belief. In this final section, I will argue that even if these views did not have the problems that afflict them, they are nevertheless unacceptable because they are radically incomplete as accounts of justified mnemonic belief.

Consider an example that I used earlier, viz., that my first-grade teacher's name was Mrs. McDonald. Recall that I claimed that as far as I could honestly tell, I have no other beliefs that I can find to support this belief. Despite this, I take it that my belief is now justified. Furthermore, last year I had this belief (in an unactivated, dispositional state) even though it had not been occurrent for quite some time. Clearly, it wasn't justified on the basis of recollection at that time, since I didn't recall it then, and hadn't for years; but surely it was justified then if it is now (since I haven't come across any new reason to believe it). So not all memory beliefs are justified via recollection, hence PF wrong. On the other hand, SF is really only a theory of the justification of *occurrent*, ostensible memory beliefs and so this example does not show that it is false, but it does indicate that SF does not account for the justificatory status of an entire and enormous class of memory beliefs.

The point here is neither subtle nor insignificant. At any given time, we all have a great number of beliefs that are justified, but for which we no longer have good evidence. Also, if what cognitive psychologists tell us is right, at any given time we are only able to recall about seven items. This means that, at very most, we could have seven beliefs that are justified via recollection (or simply by being occurrent). But it seems clear that we have a far larger number of justified beliefs for which we lack evidence. Since we don't think that dispositional and unactivated beliefs are without epistemic status, an account of the justification of memory belief that can only account for the justification of occurrent mnemonic beliefs is drastically incomplete.

Furthermore, whether a belief that I now form is justified will depend on the other justified beliefs that I have. In particular, a nonfoundational belief I now form is justificatorily dependent on the doxastic states that have a part in the production of that belief. Psychologists claim that some of what goes on in one's working memory is not conscious; hence, beliefs involved in such processing are not occurrent, although activated.²⁵ So, if one takes the basing-relation seriously, then any belief formed in part by this unconscious processing will be justified only if the beliefs on which it is based are themselves justified. Yet such basing beliefs will not be recollected; so, if either sort of foundationalism is true, it is unclear how these beliefs can have the justificatory status necessary to pass on to their progeny.

The foundationalist might try to respond by saying that any undefeated, dispositional belief state is justified because if it were to become occurrent, it would be justified. So even though at *t* the person fails to have a reason to believe that *P*, nevertheless the undefeated belief is justified since the person has a dispositional state which guarantees that if he were to have the occurrent belief that *P*, his belief would be justified.

I don't believe that this response is adequate. First of all, if my first objection to PF is right, we will frequently have occurrent beliefs (or at least activated beliefs) that lack the phenomenology of recollection. And since what determines whether one recalls has to do with the amount of attention the state receives and not with any of the state's intrinsic features, it would seem that, under the right circumstances, most of our dispositional beliefs are such that they could become occurrent without our recalling them. So the relevant subjunctive, as it stands, will be false for very many of our dispositional beliefs. One could amend it to read: if one were to believe that *P* occurrently, and to pay nonminimal attention to it, then one would have a reason to believe that *P*. While this altered version appears to get around the above objection, it does so at the cost of losing whatever initial plausibility the original had, since the solution seems entirely ad hoc. So this defense looks hopeless with respect to PF.

More generally, appealing to subjunctive conditionals of the above sort is most counterintuitive. The problem that this response is supposed to hurdle is how recollection can be the basis of mnemonic justification if the majority of our beliefs are not being recollected at a given time. The foundationalist's answer is that many of our dispositional beliefs

are justified because in the appropriate conditions they would become occurrent, and thus justified. But how does this solve the problem? What the answer seems to say is that a belief is now justified because in certain counterfactual conditions it would be justified. Yet the question wasn't how can the belief be justified in the future or how can it be justified in other worlds, but rather in virtue of what is it *now* justified *at this world*. And it is very hard to see how one's now being justified in believing that P can depend on one's having an occurrent belief at a later time, or in another world.

Since I began this essay by examining John Pollock's account of mnemonic justification, I would like to close by considering how he might respond to this objection to foundationalism. In *Knowledge and Justification*, Pollock writes the following:

The knowledge constituted by nonoccurrent remembering is nonoccurrent in the sense that one is not explicitly thinking about what it is that is known. When one consciously thinks about what it is that he knows, the memory, by definition, becomes occurrent. When philosophers have talked about knowledge, they have, as a general rule only been thinking about occurrent knowledge. It is arguable that most of what we know at any given time we know nonoccurrently, but somehow this does not seem epistemologically important. It seems that what we want to know, as epistemologists, is how it is possible for us to have occurrent knowledge. The reason for this seems to be that nonoccurrent knowledge is parasitic on occurrent knowledge. Nonoccurrent knowledge introduces no new sources of knowledge. We cannot have nonoccurrent knowledge-that-P unless we can also have occurrent knowledge-that-P The point is that epistemologists are interested in knowledge at a conscious rational level. Nonoccurrent knowledge consists merely of a certain kind of disposition to have occurrent knowledge, and does not add anything to what it is possible for us to know or how it is possible for us to come to know it The analysis of nonoccurrent memory is an interesting problem for the philosophy of mind, but it does nothing further to elucidate the structure of historical knowledge.²⁶

So Pollock would apparently be unconcerned with his theory's inability to account for justified, nonoccurrent memory beliefs. What Pollock means by 'S believes that P' and 'S has the memory belief that P' is 'S occurrently believes that P' and 'S has an occurrent memory belief that P', respectively. These, and these alone, are the domain of the epistemological enterprise with respect to ongoing beliefs.

It is hard to see much of an argument in the above quoted passage. If there is one, it seems to be that since nonoccurrently knowing that P is 'parasitic' on occurrently knowing that P, it is only the latter that need concern epistemologists. I do not find this argument very

persuasive. It appears to rely on a principle similar to this: if A is necessary for B, then B is parasitic on A, and so A and A alone is worthy of philosophical consideration. But obviously, this principle is false. A necessary condition for knowledge is truth, but that doesn't mean that knowledge is importantly 'parasitic' on truth and so isn't a worthy object of philosophical inquiry. Furthermore, the primary reason that nonoccurrent knowledge might be thought parasitic on occurrent knowledge is because nonoccurrent belief is parasitic on occurrent belief. But the condition of knowledge that has intrigued epistemologists most is not the belief condition, but the justification condition.

I think that Pollock is right that most epistemologists have been thinking only of occurrent knowledge or belief when doing their theorizing. Whether this is a virtue is where Pollock and I disagree. There are two considerations that weigh heavily on my side. First, as I noted earlier, since what one currently comes to believe justifiably is in many ways dependent on beliefs that are nonoccurrent,²⁷ it is of upmost importance that a part of our epistemological theorizing focus on just these sorts of beliefs. And, second, and more importantly, at any given time virtually all of our beliefs are nonoccurrent; so if our theory of justification or knowledge doesn't have anything to say about them, then it says precious little. That is, if a given account of justification has the result that only occurrent beliefs are justified, then accepting it commits one to the thesis that we have at most seven pieces of knowledge or justified beliefs at any given time. That, in my opinion, is too high a price to pay for foundationalism. Hence, we won't have anything like a completed theory of justification until we have an account of the justificatory status of our ongoing, nonoccurrent beliefs.

6. CONCLUSION

I conclude that, despite their initial plausibility, both phenomenalist and simple foundationalism are inadequate as theories of the justification of memory beliefs. This is not to say that all foundationalist accounts are hopeless. One might be able to construct a defensible version of foundationalism for the justification of continued beliefs that recognizes the diachronic nature of justification. But that is a job that will have to wait for another time.²⁸

NOTES

¹ Throughout this paper, I will frequently use the unmodified term *foundationalism* and its cognates to denote a type of theory that is a brand of internalism (I will explain my use of 'internalism' in Section 2). I recognize that there can be externalistic varieties of foundationalism, but they are not the target of this essay.

² My sources for this discussion are Chapters Two and Five of Pollock (1986) and Chapter Seven of Pollock (1974). Chapter Two of the earlier work is devoted to discussing a position that Pollock labels 'foundationalism'. According to his rather unorthodox use of this term, a theory counts as foundationalist only if it makes what he calls the 'doxastic assumption', i.e., the assumption that only beliefs can serve to justify other beliefs. Pollock ultimately rejects foundationalist theories so construed. In what follows, I will not assume that foundationalists make the doxastic assumption and so when I claim that Pollock is a foundationalist, I am not asserting anything that he should find objectionable. Indeed, his favored epistemological theory, what he calls 'direct realism', bears an uncanny resemblance to what the rest of us call 'foundationalism'.

A final note. Much of what follows is taken from a section of Chapter Two of Pollock (1986) entitled "Reasoning and Memory". While Pollock ultimately rejects the view that he is concerned with in the second chapter, he does remain committed to what he claims in this section. Therefore, there is nothing inappropriate in my attributing to him the view that I do.

³ Harman (1986, Ch. Four).

⁴ Pollock (1986, pp. 51–52).

⁵ *Ibid.* (pp. 46–58). Although his discussion of memory is imbedded in a chapter on a theory that he eventually rejects, Pollock never recants what he says about defeaters here; and, as his final chapter indicates, the view he adopts is quite like the one he rejects in this chapter.

⁶ Let me point out that neither sort of foundationalism glossed here bears even a remote resemblance to what Gilbert Harman labels 'foundationalism' in his discussion of the justification of memory belief in Chapter Four of Harman (1986). In fact, what I am calling 'simple foundationalism' is *very* much like the position that Harman dubs 'the coherence theory'.

⁷ Of course, I am not claiming that we have reflective access to *all* of our psychological states; rather, the claim is that we have such access to only psychological states.

⁸ In Pollock's terminology, these sorts of defeaters are called, respectively, 'rebutting' and 'undercutting'.

⁹ See Plantinga (1992, Ch. Three) for an explicit discussion of this disanalogy between memory and perception.

¹⁰ This is a very quick but generally accurate portrayal of the position found in *BonJour* (1986, pp. 155–56).

¹¹ See Feldman (1988); Audi (1988, pp. 37–39); Plantinga (1992, Ch. Three); Pappas (1980); and *BonJour* (1986, pp. 155–56). While *BonJour*'s account is significantly different from the others, he explicitly claims that memory beliefs are justified in the same way as perceptual beliefs. However, *BonJour* would not accept either PF or SF; instead he would insist that the subject have a justificatory argument which includes a premise that beliefs with the phenomenal feel of memory beliefs are likely to be true. It is not enough

that the belief simply have the phenomenological properties that it does. I should also note that while Plantinga's view is that memory beliefs are epistemically basic, he certainly doesn't hold either variety of foundationalism that will concern us. On his view, a necessary condition of a memory belief's being warranted is that it be produced by a properly functioning mnemonic faculty; that condition is not a part of either SF or PF. Plantinga also mentions explicitly that he takes memory to be importantly different from perception in that while in perception there is always a phenomenal state that causes the belief, in cases of memory, one needn't have any such phenomenal state.

¹² It might be objected that this example shows not that some memory beliefs lack phenomenological properties, but that we can fail to be aware of them. To this I respond as follows: (i) even if this point is granted, the fact that I am unaware of the phenomenal properties means that they don't justify my belief since Pollock in particular and the PF advocate generally, requires that the belief be *based on* the phenomenal state. But if I am unaware of the properties, it is hard to see how I can base my belief on them in the appropriate way; and (ii) even if the person in my example were to quit thinking about the doxastic presumption and attend more closely to the belief in question, it would lack the striking phenomenal quality of Pollock's examples.

¹³ Martin and Deutscher (1966). I thank Alvin Goldman for pointing out to me the relevance of this case for this discussion.

¹⁴ In fact, the point of this example in the original essay was to demonstrate that 'S remembers that P' does not entail 'S believes that P'.

¹⁵ Pollock (1986, p. 37).

¹⁶ Of course, any complete account of this distinction would also tell us what it is to hold a belief in the first place. But that interesting and vexing question is not important for our present concerns, so it will now be ignored.

¹⁷ See Anderson (1983).

¹⁸ While it should be uncontroversial that justification can be transferred only from one belief to another, it is of course highly debatable whether justification can be *generated* from non-doxastic states.

¹⁹ I don't mean to suggest that this sense of justification must be explicated along strictly reliabilist lines. I take it that, for example, the views of Bonjour (1986) and Lehrer (1990) are significantly truth-conducivity views as well, although they certainly aren't varieties of reliabilism.

²⁰ Alston (1985).

²¹ While Alston favors the evaluative concept of justification over its chief rival, he argues elsewhere that it is not necessary for knowledge, so it can't be equated with that which turns true belief into knowledge. See 'Justification and Knowledge' in Alston (1989, pp. 172–82).

²² Kornblith (1983).

²³ For more on this, see Alston's paper 'The Deontological Conception of Epistemic Justification', in Alston (1989 pp. 125–52; also in Tomberlin 1988, pp. 257–99), and Goldman's 'Weak and Strong Justification' (1988, pp. 51–69).

²⁴ Pollock (1986, p. 10).

²⁵ See Ellis and Hunt (1987, Ch. Three).

²⁶ Pollock (1974, p. 195).

²⁷ At a minimum, nonoccurrent beliefs can serve as defeaters. Furthermore, as suggested

above, it seems to me that epistemic status of activated, nonoccurrent beliefs which serve as part of the causal basis for a new belief are relevant to the epistemic status of their product.

²⁸ My thanks to Alvin Goldman for comments on an earlier draft of this paper.

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