

# **Antisepticism and Easy Justification**

## Ch 5 of *Seemings and Epistemic Justification*

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## 5. Antiscepticism and easy justification

### 5.1 Introduction

In this chapter I investigate the epistemological consequences of the fact that seeming-based justification is elusive, in the sense that the subject can lose it simply by reflecting on her seemings. I argue that since seeming-based justification is elusive, the antisceptical bite of phenomenal conservatism is importantly limited. I also contend that since seeming-based justification has this feature, phenomenal conservatism isn't actually afflicted by easy justification problems.

### 5.2 Antiscepticism and reflective awareness

Suppose  $P$  is the content of a possible appearance of  $S$ . A *sceptical alternative*  $SH$  or *sceptical scenario*  $SH$  alternative to  $P$  is a special error conjecture  $SH$  such that, if  $SH$  is true, (i)  $P$  is false though  $S$  has an appearance that  $P$ , and (ii)  $S$  couldn't discover that  $SH$  is true, no matter how much or how deep  $S$  might investigate. As we have seen in §2.4, one of the asserted merits of phenomenal conservatism is that it affords us the means of a thoroughgoing response to the sceptic — in particular, the sceptic who insists that  $S$  must have independent justification for ruling out any relevant sceptical alternative in order to possess justification for believing ordinary things. For instance, suppose that  $S$  has a perceptual appearance that ( $P$ ) there is a cat on the mat, and no reason to think that this appearance could be deceptive. The sceptic could argue that since it might be the case that, say, ( $SH$ )  $P$  is false and  $S$  has a hallucination that  $P$  caused by the Matrix,  $S$  has justification for believing  $P$  only if  $S$  has independent justification for ruling out  $SH$ . The sceptic will insist that since  $S$  cannot have this independent justification,  $S$  doesn't have justification for believing  $P$ . Antisceptics can attempt various lines of reply. The phenomenal conservative would respond that since (PC) is true and  $S$  has an appearance that  $P$ ,  $S$  does have prima facie justification

for believing  $P$  even if  $S$  has no independent justification for believing  $\neg SH$ .<sup>1</sup> The phenomenal conservative will conclude that since  $S$  has no reason to think that her appearance might be deceptive in the case in point,  $S$  does have justification for believing  $P$ . Although this line of response may appear very promising or even successful, it isn't free from problems.

I will now make a case to the effect that the antisceptical bite of (PC) is importantly limited. A response to the sceptic would actually be forceful only if — I suggest — it enabled a thinker  $S$  who engaged with a sceptical argument that questioned *her own* possession of epistemic justification (or knowledge) to reject or seriously challenge the argument. A paradigmatic example of such a thinker is Descartes in his *Meditations*. It appears to me, however, that (PC) doesn't allow for this type of response to the sceptic. As we have seen in §4.4, seeming-based justification is *elusive*.<sup>2</sup> For  $S$  can lose her seeming-based justification for believing a proposition  $P$  by simply reflecting on her mental states and thereby acquiring a belief that she has a seeming that  $P$ . In these circumstances,  $S$ 's seeming-based justification for  $P$  would in fact be overridden and thus *replaced* by  $S$ 's *reflective* justification for  $P$  (the one based on  $S$ 's reflective beliefs that she has a seeming that  $P$ ), where the latter justification may be very different in strength from the former. I will now show that since seeming-based justification is elusive in this sense, if  $S$  attempted to reject a sceptical argument that questioned her own possession of seeming-based justification by adducing (PC) in discussion or private reasoning,  $S$  would lose her seeming-based justification, making her appeal to (PC) ineffective.

Imagine  $S$  has an appearance that ( $P$ ) that there is an apple on the table, and no reason to think it might be deceptive. Suppose that at a certain point  $S$  engages with a sceptical argument that questions the claim that  $S$  has actual justification for believing  $P$ . The argument states — precisely

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1 I take the expression 'ruling out  $SH$ ' to mean 'believing  $\neg SH$ '.

2 I use the term 'elusive' in a sense similar to one used Lewis (1996) to describe that which he thought was an important feature of knowledge. This similarity doesn't commit me to endorsing Lewis' views.

— that since  $S$ 's appearance  $P$  can possibly be caused by the instantiation of a sceptical alternative  $SH$  to  $P$ ,  $S$  could have justification for believing  $P$  only if she had independent justification for believing  $\neg SH$ . (Suppose  $SH$  states that while  $P$  is false,  $S$  has a hallucination that  $P$  caused by an evil demon.) The argument concludes that since  $S$  doesn't have this independent justification,  $S$  doesn't possess justification for believing  $P$ . This sceptical argument is just one of those that (PC) is claimed to enable us to defuse. The question is — therefore — whether, in the imagined circumstances,  $S$  can respond successfully to this argument by adducing (PC) and contending that she does have justification for believing  $P$ . Unfortunately for the phenomenal conservative, the answer is negative.

Consider that  $S$  can actually engage with the sceptical argument under consideration only if she grasps the way in which  $SH$  puts her justification for  $P$  at risk.  $S$  can do this only if  $S$  becomes reflectively aware of her seeming that  $P$ . Furthermore, note that  $S$  can competently adduce (PC) to respond to the sceptic only if she is reflectively aware of her seeming that  $P$ . For this seeming is referred to in the relevant instance of (PC) that  $S$  is committed to invoking. If  $S$  becomes reflectively aware of her seeming that  $P$ , however, even if (PC) holds true,  $S$ 's seeming-based justification for  $P$  will be overridden by  $S$ 's reflective justification for  $P$  based on  $S$ 's *reflective belief* that she has a seeming that  $P$ . Thus, at this point, whether or not  $S$  has justification for believing  $P$  no longer depends on  $S$ 's having *seeming-based* justification, and so it doesn't hinge on (PC)'s truth. Whether or not  $S$  has justification for believing  $P$  depends on  $S$ 's having *reflective justification*, which is not accounted for by (PC). That's why  $S$  couldn't reject the sceptical argument by appealing to (PC).

In response, phenomenal conservatives might try to deny the general thesis that reflective justification overrides the correlated seeming-based justification. A basic problem of such a strategy is that the thesis appears true in the circumstances we have envisaged. Suppose that at a time  $t_0$ ,  $S$  has a seeming that  $P$  and no reason to think that it might be deceptive. In these circumstances,  $S$ 's

seeming that  $P$  gives  $S$  justification for believing  $P$ . Suppose that at a successive time  $t_1$ ,  $S$  engages with the sceptical argument that questions her having justification for  $P$ . Accordingly,  $S$  becomes reflectively aware of her seeming that  $P$ . At  $t_0$ ,  $S$  didn't have the belief that she had that seeming.  $S$  was thus unable to wonder whether her seeming was veridical or deceptive. At  $t_1$ ,  $S$  is able to pose this question and, pressed by the sceptical case, she actually does so.  $S$  finds two possible answers. A first hypothesis available to  $S$  — the *perception* hypothesis — states that  $S$  actually perceives that  $P$ . The sceptical argument offers  $S$  an alternative hypothesis  $SH$ , which states that  $P$  is false and  $S$  has a hallucination that  $P$ . It is intuitive that in this predicament,  $S$ 's seeming that  $P$  can no longer give  $S$  justification for believing  $P$ . Suppose in fact that, at  $t_1$ ,  $S$ 's seeming that  $P$  gave  $S$  justification for believing  $P$ . Since, at  $t_1$ ,  $S$  reflectively believes that she has that seeming,  $S$  would thereby acquire justification for believing that the seeming that she has is veridical — namely, for believing the perception hypothesis and ruling out  $SH$ . But this looks perversely circular: no seeming of  $S$  could *per se* provide  $S$  with (even some degree of) justification for believing that *the seeming itself is veridical*. Justification for believing so requires *independent* evidence. Hence, it appears very plausible that, at  $t_1$ ,  $S$ 's seeming that  $P$  can no longer give  $S$  justification for believing  $P$ .<sup>3</sup> (I return to these issues in §5.4.)

At  $t_1$ ,  $S$  could have some justification for believing  $P$  if  $S$  were able to conclude that the perception hypothesis is likely to be the correct explanation of her seeming's existence.  $S$  would get justification for this conclusion through an *inference* to the probable explanation of her seeming's existence. Inferences don't link *seemings* with doxastic states, they connect *premises* with conclusions — namely, *doxastic* states with other doxastic states. The inference by  $S$  would go from her *reflective belief* that she has a seeming that  $P$  to her belief that the perception hypothesis has a

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<sup>3</sup> One might alternatively attempt to stop the vicious circularity by conceding that  $S$ 's seeming that  $P$  gives  $S$  justification for  $P$  while insisting that  $S$ 's reflective acquaintance with her seeming doesn't give  $S$  justification for believing that she has that seeming. But the last claim is very counterintuitive.

good chance to be true. At  $t_1$ ,  $S$  could possibly acquire justification for  $P$  via an inference like this. These considerations strongly suggest that, at  $t_1$ , it is  $S$ 's reflective belief that she has a seeming that  $P$  — rather than  $S$ 's seeming itself — that provides the basis of  $S$ 's justification for  $P$ .<sup>4</sup> At  $t_1$ ,  $S$ 's seeming that  $P$  only plays an indirect role:  $S$ 's acquaintance with this seeming forms the basis of the justification of the *premise* of  $S$ 's inference —  $S$ 's reflective belief that she has a seeming that  $P$ . In conclusion, at  $t_1$ ,  $S$ 's seeming-based justification for  $P$  appears to be overridden by  $S$ 's reflective justification for  $P$ . This is why  $S$  couldn't reject the sceptical argument by appealing to (PC).

A question naturally arising at this point is whether  $S$  would actually be able to acquire enough justification to believe  $P$  once she has engaged with the sceptical argument. I cannot hope to settle this important question here. Let me make only one remark. We should concede to the sceptic that  $S$  could have justification sufficient to believe  $P$ , in this case, *only if*  $S$  had higher independent justification for believing  $\neg SH$ . This is so because in the imagined circumstances,  $S$ 's reflective justification for  $P$  would override  $S$ 's seeming-based justification for  $P$  and — as we have seen in §4.4 — the strength of  $S$ 's reflective justification has an upper bound in the strength of  $S$ 's independent justification for believing that *any* relevant error conjecture is false; so, also for believing  $\neg SH$ .

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<sup>4</sup> This discussion naturally suggests a view about *epistemic justification* that parallels Sosa's celebrated thesis there are two different kinds of *knowledge*. According to Sosa,

One has *animal knowledge* about one's environment, one's past, and one's own experience if one's judgments and beliefs about these are direct responses to their impact — e.g., through perception or memory — with little or no benefit of reflection or understanding... [Furthermore,] one has *reflective knowledge* if one's judgment or belief manifests not only such direct response to the fact known but also understanding of its place in a wider whole that includes one's belief and knowledge of it and how these come about. (1991: 240).

Animal knowledge is mere *reactive* knowledge, whereas reflective knowledge is mainly *unifying* or *integrating* knowledge. One could similarly distinguish between *animal justification* and *reflective justification*.  $S$ 's animal justification for believing  $Q$  is identifiable with  $S$ 's justification for  $Q$  based on her seeming that  $Q$ . Animal justification has essentially the function of certifying the rationality of  $S$ 's reactive beliefs — those directly caused by  $S$ 's appearances.  $S$ 's reflective justification for believing  $Q$  is instead justification based on  $S$ 's belief that she has an appearance that  $Q$ . Justification of this type stems from  $S$ 's ability to *explain* her appearance that  $Q$  by adducing  $Q$  in conjunction with other propositions about her environment and cognitive faculties. Reflective justification has the function of certifying the rationality of the beliefs of  $S$  that aim at a unified and integrated view of the world.

One might suggest that, thanks to (PC), this condition necessary for  $S$ 's having enough reflective justification for believing  $P$  is satisfied as long as  $SH$  refers to a *sceptical* conjecture (rather than an ordinary error conjecture). The suggestion precisely says that since  $SH$  is a terribly far-fetched, odd and unnatural proposition as only sceptical scenarios can be, if  $S$  were going to appraise  $SH$ ,  $S$  would normally have a *seeming* that  $\neg SH$ . And this seeming would grant  $S$  enough prima facie justification to believe  $\neg SH$ . Note that if this is true, our seemings can provide us with *immediate* justification for ruling out sceptical conjectures.

Since I have actually heard this suggestion a few times in conversation, let me briefly examine it. My view is that the suggestion faces a series of hurdles, and ultimately fails. To begin with, note that if  $S$  had a seeming that  $\neg SH$ , the conclusion licensed by (PC) would be that  $S$  has prima facie justification *sufficient* to believe  $\neg SH$ . However, we have seen that  $S$  could have reflective justification sufficient to believe  $P$  only if she had *higher* justification for believing  $\neg SH$ . Thus, even if  $S$  had a seeming that  $\neg SH$ , it is unclear that the condition necessary for  $S$ 's having enough reflective justification to believe  $P$  would be met. The argument under consideration seems to rely on a principle of seeming-based justification *stronger* than (PC), which should be clarified and defended. Another concern — which I have articulated in Moretti (2019) — is that  $S$ 's justification based on a seeming that  $\neg SH$  would be *elusive* in the same way as  $S$ 's seeming-based justification for  $P$  is elusive.  $S$  would lose her seeming-based justification for  $\neg SH$  if she engaged with a sceptical argument that questioned her possession of it.

There are more serious problems: under closer scrutiny, it is quite dubious that if  $S$  inspected  $\neg SH$ ,  $S$  would actually have a seeming that  $\neg SH$ , or seeming-based justification sufficient to believe  $\neg SH$ . To begin with, note that a seeming that  $\neg SH$  would not need to come with sensory or mental images of any type — it would be *qualia-free*. It would thus closely resemble a *rational* (or a *priori*) appearance, such as an appearance that  $1 = 1$ . A seeming that  $\neg SH$  couldn't however qualify

as a rational seeming, for rational seemings are about *necessary* truths, and  $\neg SH$  doesn't look like a necessary truth. This might raise some initial concern about the claim that  $S$  can have a seeming that  $\neg SH$ . Nevertheless, some authors think that people can entertain qualia-free seemings that are not rational seemings. This could happen, for instance, in attested cases of blindsight. According to these authors, in these cases, self-avowed blind or partly blind subjects have accurate seemings about objects present in their environment, although they have *no visual sensation* (cf. Tucker 2010 and Huemer 2013). Since the content of a qualia-free seeming of this type would be a *contingent* proposition, one can insist that there is no principled problem with the claim that  $S$  can entertain a qualia-free seeming that  $\neg SH$ , though  $\neg SH$  is contingent.

Even so, the claim is questionable. A seeming that  $\neg SH$  can be free from *non-cognitive* qualia (e.g. colours, flavours, smells, sounds, and so on) but it cannot be completely free from *cognitive* qualia. Phenomenal conservatives admit of at least one cognitive *quale*: the phenomenal force of appearances (described in §2.3). Because of its phenomenal force, a seeming that  $\neg SH$  is supposed to be an experience of *verifying* or *ascertaining* that  $\neg SH$ . However, when one inspects a proposition like  $\neg SH$ , admittedly, one normally has no experience of this sort. So, again, it looks dubious that  $S$  can have a seeming that  $\neg SH$ .

To respond, one could suggest that seemings can actually be *stronger* or *weaker* because their phenomenal force is not just a matter of all or nothing but, rather, it comes in degrees (cf. Huemer 2005: 100 and Koksvik 2011: 127). One could then insist that a seeming that  $\neg SH$  would just be a *weak* seeming. This would explain why when we inspect a proposition like  $\neg SH$ , we don't have the feeling of verifying that  $\neg SH$ . Suppose this is correct. If  $S$ 's seeming that  $\neg SH$  were a weak seeming, presumably, it would provide  $S$  only with *weak* justification for  $\neg SH$ .<sup>5</sup> Therefore,  $S$

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<sup>5</sup> The weak version (pc) of (PC), presented in §2.2, can account for weak seeming-based justification of this type.



would not have justification sufficient to believe  $\neg SH$ . So,  $S$  could not have reflective justification sufficient to believe  $P$ . In conclusion, this rejoinder doesn't help.

The only alternative reply I can think of draws on Huemer (2016)'s theory of *inferential seemings*, which expands phenomenal conservatism to deliver an account of inferential justification. According to Huemer's theory,  $S$ 's having *inferential* justification for  $Q$  from  $P$  requires — among other things —  $S$ 's having justification for believing  $P$ , and  $S$ 's entertaining an *inferential seeming* that represents  $Q$  as likely in light of  $P$ ,<sup>6</sup> where the likelihood can be relative to  $S$ 's background information  $B$ . In particular,  $S$ 's inferential seeming would include reference to  $B$  if  $S$ 's sense of likelihood constituting the seeming were generated by mental processes of  $S$  shaped by  $B$ , and if  $S$  would be disposed to acknowledge, if the issue arose, the relevance of  $B$  to the likelihood of  $Q$ . Huemer suggests that a limiting case of  $S$ 's having inferential justification for  $Q$  is one in which only  $B$ , but no premise  $P$ , is involved in the justification for  $Q$ . Here is an example:

When the issue arises as to what country I occupy, it seems to me very likely (to put it mildly) that I live in the United States. This sense of likelihood is shaped by a host of past experiences and beliefs of mine that are relevant to where I live, including many experiences and beliefs that I do not now remember. That is part of why my sense of likelihood counts as referring to the probability of my living in the United States *conditional on* all those past experiences and beliefs. But... it is also a matter of how I would react if some of these past experiences or beliefs were raised in connection with the question of how likely it is that I live in the United States. For example, if the question arises, I will view the fact that Colorado is in the United States (which I believe) as supporting the claim that I “probably” live in the United States. (2016: 158).

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<sup>6</sup> When  $P$  just entails  $Q$ , the seeming represents  $Q$  as maximally likely in light of  $P$ .

One could contend that  $S$ 's seeming that  $\neg SH$  would actually be an appearance of this type. If this is correct, the seeming would be — precisely — an appearance that  $\neg SH$  is likely. This would clarify why  $S$  would not have the feeling of *verifying* that  $\neg SH$ .

However, also this rejoinder is problematic.  $S$ 's seeming that  $\neg SH$  is likely could supply  $S$  with justification sufficient to believe that  $\neg SH$  is likely. It is unclear, however, that a seeming of this sort could give  $S$  justification sufficient or even more than sufficient to *believe*  $\neg SH$ . One might however suppose that if  $\neg SH$  appeared *extremely* likely to  $S$ ,  $S$  might get justification sufficient or even more than sufficient to believe  $\neg SH$ . So, the question is whether or not  $\neg SH$  would appear to  $S$  to be extremely likely. According to Huemer's theory, how likely  $\neg SH$  would appear to  $S$  to be is determined by the content of  $\neg SH$  and background information  $B$ . Suppose for example  $S$  has a firm background belief that ( $ND$ ) demons don't exist. If  $SH$  stated that  $S$  is deceived by a demon into experiencing as if  $P$ ,  $S$  might in these circumstances have a seeming that  $\neg SH$  is extremely likely. This won't always be the case, though. Suppose  $S$  believes  $ND$  but  $SH$  states that  $S$  is hallucinated by the Matrix. Or suppose  $SH$  states that  $S$  is hallucinated by a demon but  $S$  doesn't believe  $ND$ . In either case,  $S$  may not have a seeming that  $\neg SH$  is extremely likely. Indeed, there is no guarantee that  $S$  would have a seeming that  $\neg SH$  is extremely likely. Whether or not  $S$  would have such a seeming depends on the specific contents of  $SH$  and  $B$ .

It is also important to note that if  $SH$  were a *global* sceptical conjecture,  $S$ 's conceiving of  $SH$  could result in altering the content of  $B$ , which could preclude  $S$  from having a seeming that  $\neg SH$  is likely. Suppose for example that  $SH$  states that  $S$  is a disembodied soul in an immaterial world deceived by an evil demon into perceiving the ordinary world. Imagine that  $S$  initially believes  $ND$  (demons don't exist) on the grounds of *evidence coming from her science readings*.  $S$ 's conceiving of  $SH$  could lead  $S$  to doubt that she actually has evidence for  $ND$ , thus to doubt  $ND$ .

Because of this,  $S$  may become unable to entertain a seeming that  $\neg SH$  is likely. To conclude, even if Huemer's theory of inferential seemings were correct, there would no guarantee that, upon inspecting  $SH$ ,  $S$  would have seeming-based justification sufficient on more than sufficient to believe  $\neg SH$ .

In summary, we have seen that the antisceptical bite of (PC) is importantly limited because  $S$  couldn't successfully appeal to (PC) to rebut a sceptical argument that questioned her own possession of appearance-based justification for a proposition  $P$ . The problem is that as  $S$  engaged with the argument or competently invoked (PC), her seeming-based justification for  $P$  would be replaced by reflective justification for  $P$ , which may not suffice to sustain  $S$ 's belief that  $P$ . We have also seen that the truth (PC) cannot guarantee the fulfilment of a condition necessary to make  $S$ 's reflective justification robust enough to sustain  $S$ 's belief that  $P$ .

### 5.3 Easy justification objections

In the former section I have argued that the fact that seeming-based justification is elusive (in the sense explained) has a negative impact on phenomenal conservatism, as it weakens its antisceptical bite. Allow me now to show that the very same fact also has a positive consequence for phenomenal conservatism, as it offers its supporters the means to reject two apparently forceful objections against it. In this section I present these objections. My cases against them will follow in the next two sections.

Consider a subject  $S$ , an evidence source  $ES$  (such as perception, memory, induction, etc.) and a proposition  $P$ . Suppose  $ES$  provides  $S$  with evidence that  $P$ . Any view  $W$  (internalist or externalist) that allows  $S$  to know that  $P$  on the basis of  $ES$  regardless of  $S$ 's having independent knowledge that  $ES$  is reliable is called by Cohen a *basic knowledge* theory. Cohen (2002, 2005) contends that any basic knowledge theory  $W$  is affected by *easy knowledge* problems. In particular,

on  $W$ , it will prove *too easy* for  $S$  to know that  $ES$  is reliable, which suggests that  $W$  is flawed.

Cohen's arguments often range from focusing on knowledge to focusing on epistemic justification.

The problems of easy knowledge can indeed be reformulated in terms of *easy justification*. Let's

call *basic justification* theory any view  $W$  (internalist or externalist) that allows  $S$  to acquire

justification for believing  $P$  through  $ES$  regardless of  $S$ 's having independent justification for

believing that  $ES$  is reliable. According to Cohen any basic justification theory  $W$  is plagued by

*easy justification* problems. In particular, on  $W$ , it will prove *excessively* easy for  $S$  to acquire

justification for believing that  $ES$  is reliable, which suggests that  $W$  is flawed.

Suppose again that  $ES$  provides  $S$  with evidence that  $P$ . There are various ways to interpret the claim that  $ES$  is *reliable*. Let's consider two of them. That claim can be read as stating that  $ES$  is reliable *in this particular case* — meaning that  $S$ 's evidence that  $P$  is not deceptive — or it can be interpreted as stating that  $ES$  is reliable *in general* — meaning that the propositions which  $ES$  supplies (good) evidence for are true most of the time. When Cohen speaks of the reliability of  $ES$ , he means the reliability of  $ES$  in general.<sup>7</sup> In my discussion, I will also refer to the notion of reliability in a particular case. For it appears to me that the two principal varieties of easy justification problems described by Cohen actually arise from interpreting 'reliability' in these two respective senses. (I give examples below.) Hereafter, I will focus on justification.

Cohen (2002, 2005) maintains that phenomenal conservatism is plagued by easy justification problems — this is indeed a recurrent criticism of phenomenal conservatism. See for example White (2006), Wright (2007), and Siegel and Silins (2015).<sup>8</sup> In fact note that (PC) qualifies as a basic justification theory, as it allows  $S$  to have justification for  $P$  from a seeming that  $P$  regardless of  $S$ 's having independent justification for believing that the seeming is reliable, and

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<sup>7</sup> See especially Cohen (2005).

<sup>8</sup> These authors focus on perceptual dogmatism, but their objections can be extended to hit more generally phenomenal conservatism.

irrespective of  $S$ 's having independent justification for believing that the seemings of the same type are accurate most of the time. Epistemologists formulate the easy justification problems as objections that target theories of basic justification — precisely, as the *easy justification from closure objection* and the *easy justification from bootstrapping objection*. Let's see how these objections can be used to strike phenomenal conservatism.

The easy justification from closure objection interprets 'reliable' as 'reliable in a particular case' and exploits the *principle of closure of justification under known entailment*, according to which:

(JC) If  $S$  has justification sufficient to believe  $P$  and  $S$  knows that  $P$  entails  $Q$ , then  $S$  has justification sufficient to believe  $Q$ .

(JC) or a very similar principle is pervasively used in science and ordinary epistemic practices to expand the set of one's justified beliefs via deduction. (JC) looks very plausible and most epistemologists endorse it.

This is how the objection unfolds (cf. Cohen 2002). Consider a proposition  $R$  and a correlated error conjecture  $SH$ . Suppose for instance that:

$R$  = 'the table is red';

$SH$  = 'the table is white but seems red because it is illuminated by a hidden red light'.

Imagine  $S$  has an appearance that  $R$  and no reason to suspect that the appearance is deceptive. If (PC) is correct,  $S$  will acquire justification sufficient to believe  $R$ . Since  $S$  knows that  $R$  entails  $\neg SH$ , thanks to (JC),  $S$  will also acquire enough justification to believe  $\neg SH$ . Indeed, since  $SH$  can be replaced by any alternative error conjecture  $S$  might think of,  $S$  will get justification sufficient to believe — more generally — that her seeming is reliable. However, acquiring justification in this

way appears really too easy. If one could rationally exclude all relevant error possibilities in this rather simple way, one would never rely on inductive justification from past cases to dispel sceptical concerns,<sup>9</sup> and one would never perform independent checks.<sup>10</sup> However, as a matter of fact, people do rely on inductive justification from past cases and they often perform independent checks to exclude possible mistakes (cf. Cohen 2002: 313). There is a more fundamental reason why such a way to get justification looks counterintuitive: saying that *S* can rationally rule out possible cognitive errors in the way described is substantially the same as saying that a seeming of *S* on its own and without the help of independent evidence can give *S* justification for believing that the seeming itself is not deceptive. This appears hopelessly circular (cf. Siegel and Silins 2015: 787). In conclusion, since (JC) and (PC) jointly sanction this intuitively flawed way to acquire justification for rejecting error conjectures, but (JC) is intuitively very plausible, (PC) must be flawed. It is important to note that a principle alternative to (PC) which permitted *S* to acquire justification from a seeming only if *S* had independent justification for believing that the seeming is reliable would not raise the easy justification problem just described. On this alternative principle, in order to receive justification from a seeming, *S* should *already* have justification for ruling out the relevant error conjectures. Therefore, *S* would not acquire this justification from her seeming.<sup>11</sup>

Let's turn to the bootstrapping objection. A version of this argument was initially raised by Fumerton (1995) and Vogel (2000) against *reliabilism* about justification, but it became soon clear that *internalist* theories of basic justification can also be targeted by it. This objection interprets 'reliable' as 'generally reliable' and makes use of both deductive and ampliative inferences. Furthermore, also this objection relies on thought experiments. Cohen (2010) for example imagines

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9 For example, to try to rule out *SH*, *S* could consider how many times in the past she was actually tricked into believing that an object had a certain colour by a hidden light shining on it.

10 For instance, to rule out *SH*, *S* could carefully check all light sources above the table.

11 This would instantiate a case of *failure of transmission of justification* (see for instance Wright 2002 and Moretti and Piazza 2018).

a scenario like this: suppose that, having no idea whether her colour vision is reliable, *S* decides to test it. A friend stands above *S* and holds up many coloured cards, one at a time. *S* looks at the first card and reasons:

- (1) The first card appears red to me.
- (2) The first card is red.
- (3) The first card is red and appears red to me.
- (4) Therefore, my colour appearance matches the actual colour of the card on this occasion.

Suppose (PC) is true. Since *S* bases her belief (2) on her seeming that the card is red, and she has no reason to suspect that the seeming is deceptive, (2) is justified for *S*. Since *S* bases her belief (1) on her reflective acquaintance with that seeming, (1) is also justified for *S*. Furthermore, (3) is justified for *S* because she deduces it from (1) and (2); and (4) is justified for *S* because she deduces it from (3). Imagine now that *S* reasons exactly the same way for each of *n* cards held up by her friend: the second card is blue, it appears blue to me, so the second card is blue and appears blue to me, etc. Eventually, *S* will deductively infer:

- (5) My colour experiences have always matched the actual colour of each of the *n* cards that I have viewed.

Since the premises of (5) are all justified for *S*, (5) is also justified for her. Imagine that *S* finally infers from (5) by enumerative induction (cf. Cohen 2005) or inference to the best explanation (cf. White 2006):

(6) My colour vision is reliable.

Provided that the number  $n$  of cards viewed by  $S$  is sufficiently large,  $S$  will justifiedly believe (6).

The problem is — again — that acquiring justification for believing that an evidence source is reliable in this way looks far too easy. It is intuitively implausible that  $S$  could arrive at justifying the claim that her colour appearances are generally reliable by relying *only* on her colour appearances, and without any independent verification of their accuracy. Since the deductive and inductive steps of this procedure appear straightforward, and it is very plausible that  $S$  does have justification for (1) by reflective acquaintance with her seeming, the problem must lie in (2). We should conclude, therefore, that  $S$  cannot have justification for believing (2) on the basis of her seeming in these circumstances. This is possible only if (PC) is incorrect. So (PC) must be incorrect. It is important to note that a principle alternative to (PC) which permitted  $S$  to acquire justification from an appearance only if  $S$  had independent justification for believing that the appearances of the same type are reliable would not raise this easy justification problem.<sup>12</sup> For if  $S$  could acquire justification for (2) only if  $S$  had *already* justification for believing that (6),  $S$  wouldn't acquire this justification for (6) through the inferential steps described above.

#### 5.4 Answering the easy justification from closure objection

As Siegel and Silins (2015) suggest, to respond to the easy justification from closure objection, phenomenal conservatives might be tempted to reject the closure principle (JC) and contend that justification need not transmit across deductive arguments like the one from  $R$  to  $\neg SH$ .<sup>13</sup> A problem

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<sup>12</sup> Weisberg (2010) nevertheless contends, against Cohen, that also *non-basic* justification theories of this type are affected by a variant of the bootstrapping problem, so this problem is actually a paradox rather than an objection to specific epistemological views like phenomenal conservatism or reliabilism. See Cohen (2010) for a response.

<sup>13</sup> An attempt in this direction is in Cohen (2002). For views that reject (JC) independent of the easy justification problem see for instance Dretske (1970) and Avnur (2012).



of this strategy is that even if (JC) turned out not to be true across the board, (JC) appears true when applied to *ordinary* propositions like  $R$  and  $\neg SH$ . (Recall that  $R$  states that table is red, and  $SH$  states that the table is white but seems red because it is illuminated by a hidden red light.) So, this line of reply doesn't look promising. Let me discuss an alternative and influential response, worked out independently by Pryor (2004) and Markie (2005), which doesn't involve rejecting (JC). My own response will emerge from the criticism of this response.

Pryor and Markie admit that when we inspect arguments like the one from  $R$  to  $\neg SH$ , licensed (PC), we have the impression that they are *in some sense* defective. According to them, however, our feeling doesn't stem from our perceiving that these arguments cannot actually transmit justification to their conclusions;<sup>14</sup> it rather originates from our sensing that these arguments have no *dialectical* power, so they are of limited use. Pryor and Markie insist that since arguments of this type are *epistemically* impeccable, there is no reason to think that (PC) and similar principles of immediate justification are flawed or problematic.

To understand Pryor and Markie's contention, consider the following scenario, used by Cohen (2002) to introduce the easy knowledge from closure objection:

Suppose my son wants to buy a red table for his room. We go in the store and I say, 'That table is red. I'll buy it for you.' ... [He] worries, 'Daddy, what if it's white with red lights shining on it?' I reply, 'Don't worry — you see, it looks red, so it is red, so it's not white but illuminated by red lights.' Surely, he should not be satisfied with this response. (314)

According to Pryor and Markie, what actually explains the impression that the boy wouldn't be rationally persuaded by his father to believe  $\neg SH$  in this scenario is our sensing that the argument

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<sup>14</sup> Markie focuses on knowledge rather than justification, but his claims can be recast in terms of justification.

from  $R$  to  $\neg SH$ , adduced by the father, is dialectically ineffective. Any dialectically ineffective argument is such that it is unable to persuade an interlocutor of the truth of its conclusion if the interlocutor doubts the conclusion beforehand. For the subject who does so is *rationally committed* to not accepting the evidence offered in support of the premise as a justification for believing it.<sup>15</sup> The argument from  $R$  to  $\neg SH$  appears to have this problematic feature. Since the boy doubts  $\neg SH$  (he doubts whether or not the table is white but seems red as deceptively illuminated), he cannot accept his own appearance that  $R$  (that the table is red) — referred to in his father's case — as a justification for  $R$ . So, he couldn't rationally believe  $\neg SH$  in virtue of his father's argument.<sup>16</sup>

Pryor and Markie think that despite this argument is dialectically powerless, the boy does acquire justification for believing  $\neg SH$  thanks to the argument. For he has a seeming that  $R$  and no defeating evidence. So, the boy must have justification for believing  $R$ ,<sup>17</sup> and he must also have justification for believing  $\neg SH$  when he appreciates that  $R$  entails  $\neg SH$  (cf. Pryor 2004: 362-368). A very similar diagnosis can be produced — according to Prior and Markie — for all deductive arguments sanctioned by (PC) and similar principles of immediate justification that *seem* to enable us to rule our error conjecture too easily. These arguments are in fact all epistemically faultless, though dialectically ineffective.

In order to assess Pryor and Markie's claims, it is instructive to examine Cohen (2005)'s rejoinder. Cohen concedes that a diagnosis like the one detailed above can *partly* explain the feeling that arguments such as the one from  $R$  to  $\neg SH$  are defective, but he contends that it cannot provide the full explanation. For arguments like these — according to him — are *both* dialectically ineffective *and* epistemically flawed. To support his view, Cohen produces a variant of the scenario

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<sup>15</sup> I follow Pryor (2004)'s account, as it is much more detailed than Markie (2006)'s.

<sup>16</sup> As clarified in §2.4, rational commitment is a type of *coherence* between propositional attitudes that doesn't require them to be justified. So, even if the boy's doubt that  $\neg SH$  is suppositional or hypothetical and so unjustified, this attitude still rationally commits him to not accepting his seeming that  $R$  as a justification for  $R$ .

<sup>17</sup> This is meant to be *propositional* justification. If the boy actually believed  $R$ , his belief would be irrational and so *doxastically* unjustified.

described before. In this variant, his son no longer doubts  $\neg SH$ . He accepts that his father knows that  $\neg SH$ , and asks him why it is the case that  $\neg SH$ . The father answers in the same way as before: ‘Oh, that’s easy. [The table] looks red, so it is red, so it is not white with red lights shining on it.’ (2004: 420). Cohen emphasizes that it is still intuitive that his son would find the argument unconvincing. He observes that since the boy no longer *doubts*  $\neg SH$ , we couldn’t explain this intuition by claiming that the argument is dialectically ineffective. According to Cohen, this example strongly suggests that the weakness of arguments like the one from  $R$  to  $\neg SH$ , authorized by (PC), is also epistemic, not just dialectical. Although Cohen apparently scores points against Pryor and Markie in this case, I believe that these two authors are ultimately correct when they claim that the arguments like the one from  $R$  to  $\neg SH$ , authorized by (PC), are epistemically impeccable.

A source of confusion that permeates through this dispute is the fact that neither Pryor and Markie nor Cohen distinguish between *seeming-based* justification and correlated *reflective* justification. The deductive arguments *licensed by (PC)* are meant to convey — specifically — seeming-based justification, rather than reflective justification. If phenomenal conservatives drew this distinction and held these two types of justification apart, they could untangle the apparently conflicting intuitions that a cursory analysis of these arguments tends to produce. In this way, they could rebut the easy justification from closure objection. Let me show how to do this.

Suppose a subject  $S$  has a seeming that  $R$  and no defeater. Thanks to (PC),  $S$  has justification for believing  $R$  based on that seeming. The thesis that if  $S$  realizes that  $R$  entails  $\neg SH$ ,  $S$ ’s justification *based on her seeming that  $R$*  can transmit to  $\neg SH$  appears to be straightforward, despite Cohen’s opinion. As said, an asserted problem of this thesis is that transmitting justification in this way seems viciously circular. For, in this way,  $S$ ’s seeming that  $R$  would provide  $S$  with justification for believing that *the seeming that  $R$  itself* is not deceptive, which appears impossible. Under closer

scrutiny, however, this claim proves false. Recall that seeming-based justification is elusive because it “vanishes” as the subject becomes reflectively aware of the relevant seeming. Accordingly, when  $S$  has justification for  $R$  based on her seeming that  $R$ ,  $S$  cannot be reflectively aware of her seeming. Now, suppose that  $S$ 's justification based on her seeming that  $R$  transmits to  $\neg SH$ . Since  $S$  is not aware of having the seeming that  $R$ , this justification cannot count for  $S$  as a reason for believing that the seeming that  $R$  itself (of which she is not aware) is not deceptive.<sup>18</sup> On the other hand, if  $S$  became reflectively aware of her seeming,  $S$  would no longer have that seeming-based justification. Thus,  $S$  would not have a reason for believing that her seeming that  $R$  is not deceptive based on that seeming only. In conclusion, this way to get justification for  $\neg SH$  doesn't involve vicious circularity.  $S$  can acquire *seeming-based* justification for believing  $\neg SH$  without circularity through the entailment from  $R$  to  $\neg SH$  and, if  $S$  actually deduces  $\neg SH$ ,  $S$  can acquire a seeming-based justified belief that  $\neg SH$  without circularity. Analogous considerations apply to any other similar deductive argument authorized by (PC).

One might doubt that  $S$  could actually acquire seeming-based justification for believing  $\neg SH$  via the argument from  $R$  to  $\neg SH$ . For one might suppose that  $S$ 's mere thinking of  $\neg SH$  would instantly turn  $S$ 's attention to her seeming that  $R$ , which would wipe out her seeming-based justification for the premise. But this is false. Whether  $S$ 's thinking of  $\neg SH$  would make  $S$ 's reflectively aware of her seeming that  $R$  depends on the specific circumstances. Here is an example of a situation in which  $S$ 's thinking of  $\neg SH$  would probably *not* make  $S$ 's reflectively aware of her seeming that  $R$ . Note first that  $\neg SH$  is equivalent to the *disjunction*:

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<sup>18</sup> Also note that  $\neg SH$  doesn't entail the proposition that  $S$  has a seeming that  $R$ . So,  $S$ 's believing  $\neg SH$  wouldn't involve  $S$ 's believing that she has that seeming.

(A) It is not the case that the table is white *or* (B) it is not the case that the table seems red because it is illuminated by a hidden red light.<sup>19</sup>

Note that  $R$  entails  $\neg SH$  just because  $R$  entails  $A$ . The content of  $B$  is irrelevant; the entailment would hold true even if  $B$  were a random proposition. Now imagine that  $S$  takes an introductory course to logic.  $S$  happens to justifiedly believe  $R$  on the basis of her seeming that  $R$ . To practise logical connectives,  $S$  is asked by the teacher to deduce from  $R$  various disjunctions each of which including one random disjunct. To do this,  $S$  keeps the disjunct  $A$  fixed and forms the other disjunct of the disjunctions by picking out in sequence the members of a list of random propositions provided by the teacher. The list happens to include  $B$ . At a certain point  $S$  deduces  $\neg SH$ . Since  $S$  justifiedly believes  $R$ ,  $S$  justifiedly believes  $\neg SH$  too. Nevertheless, given the circumstances ( $S$  is doing logic rather than, say, epistemology) and  $S$ 's peculiar way to put together  $\neg SH$ , it is plausible that  $S$ 's thinking of  $\neg SH$  and deducing it from  $R$  won't lead  $S$  to introspect herself and become aware of her seeming that  $R$ .

Another asserted difficulty of arguments like the one from  $R$  to  $\neg SH$ , licensed by (PC), is that they generate a puzzle. If these deductive arguments are epistemically impeccable, why do people resort to inductive evidence or make independent checks, rather than simply running the arguments, to dispel concerns about the reliability of their appearances? But this puzzle can easily be unravelled. Note that when one is concerned about the accuracy of an appearance that one entertains, one is reflectively aware of it. Take then the argument from  $R$  to  $\neg SH$  enabled by (PC). When  $S$  is concerned about the accuracy of her seeming that  $R$ , and so  $S$  is reflectively aware of it, the basis of her justification for  $R$  is, not her seeming that  $R$ , but her reflective belief that she has that seeming. This explains why, when  $S$  is concerned about the accuracy of her seeming that  $R$ ,  $S$

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<sup>19</sup> Since  $\neg(X \& Y)$  is equivalent to  $\neg X$  or  $\neg Y$ .

cannot use the argument from  $R$  to  $\neg SH$ , licensed by (PC), to justifiedly conclude that  $\neg SH$ .

There is more.  $S$  can have justification for  $R$  based on her reflective belief that she has a seeming that  $R$  only if  $S$  has *already* justification for  $\neg SH$ — namely, inductive justification from similar past cases or justification based on an independent check of  $\neg SH$ . This clarifies why, when  $S$  is concerned about the accuracy of her seeming that  $R$  because she suspects that  $SH$  might be true,  $S$  will look for inductive justification for  $\neg SH$  or will make an independent check of it. Analogous considerations apply to any deductive argument licensed by (PC) similar to the one from  $R$  to  $\neg SH$ . Thus, it is not puzzling, after all, that people resort to inductive evidence or independent checks when they worry about the accuracy of their appearances, rather than running these arguments.

We are now in a position to provide an accurate interpretation of Cohen's thought experiments. Recall that in the first thought experiment, Cohen's son doubts  $\neg SH$ , but he is not persuaded by his father's argument to believe  $\neg SH$ . The father argues that since it appears that  $R$ ,  $R$  is true, therefore,  $\neg SH$  is also true. In the second thought experiment, the boy doesn't doubt  $\neg SH$ . He only wants to know how his father knows that  $\neg SH$ . His father runs the same argument as before, which the son finds again unconvincing. My diagnosis of why this argument isn't persuasive in these scenarios will complete my response to the easy justification by closure objection.

Let's start with the first scenario. Since the boy doubts the accuracy of his seeming that  $R$  at the outset, he is reflectively aware of his seeming, and thus he justifiedly believes the proposition that he has a seeming that  $R$ . This belief constitutes the basis of his justification for  $R$ . When his father claims that since it appears that  $R$ , then  $R$  is true, the boy assesses this claim. Specifically, the boy evaluates whether the proposition that he himself has an appearance that  $R$  is a good reason to believe  $R$ . To boy realizes that this proposition could actually be such a good reason only if he *already* had a good reason to believe  $\neg SH$ . The boy then assesses the father's second claim that since  $R$  is true, then  $\neg SH$  is true. The boy realizes that he cannot come to have a good reason to

believe  $\neg SH$  in this way. For he must have a good reason to believe  $\neg SH$  in the first place to carry out the reasoning. That's why the boy finds his father's argument unpersuasive. This thought experiment says nothing about the argument from  $R$  to  $\neg SH$  licensed by (PC). For the argument that the boy doesn't find persuasive is not one licensed by (PC).

Pryor and Markie's analysis of this case is *partly* misguided. Pryor and Markie claim that since the boy doubts  $\neg SH$ , he cannot accept his own appearance that  $R$  as a justification for  $R$ . I agree with them on this.<sup>20</sup> This is an additional reason why the boy may find his father's argument unconvincing. Yet Pryor and Markie also think that the boy, in this scenario, does possess justification for believing  $R$  because he has a seeming that  $R$  and no defeating evidence. They also think that the boy's justification for  $R$  transmits to  $\neg SH$  across the entailment. Both claims are problematic. Concerning the first, my view is that the boy *can* have justification for believing  $R$  if he has independent (and stronger) justification for believing  $\neg SH$ . However, the basis of the boy's justification is, in this case, his reflective belief that he has the seeming, not the seeming itself. The second claim is false: the boy's *reflective* justification for  $R$  doesn't transmit to  $\neg SH$ .

Let's turn to Cohen's second thought experiment. In this case, the boy has thought of the possibility that his seeming that  $R$  is deceptive — so he is reflectively aware of it — but he has ruled out this possibility because he thinks that his father knows that  $\neg SH$ . When the father explains to him how one can conclude that  $\neg SH$  by adducing the argument described before, the boy finds it unconvincing. The explanation is identical to the one detailed before.

To conclude, phenomenal conservatism is not endangered by the problem of easy justification from closure. Under close scrutiny, the asserted difficulties dissolve.

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<sup>20</sup> If the boy has independent justification for  $\neg SH$ , but doubts  $\neg SH$ , he cannot take the proposition that he has an appearance that  $R$  to be a justification for  $R$ .

### 5.5 Answering the easy justification from bootstrapping objection

Supporters of (PC) and similar principles of immediate justification almost generally acknowledge that bootstrapping arguments, such as (1)-(6) described in §5.3, are epistemically defective.<sup>21</sup> These authors typically respond to the bootstrapping objection by insisting that if a subject *S* endorses (PC) or a similar principle, *S* is not committed by this very fact to accept the *illicit* step of the bootstrapping reasoning, which is almost always identified with the *non-deductive* one. This step would in fact be biased or defeated, as it would conflict with key methodological principles. Solutions of this type are for instance developed in Cohen (2002, 2005), Vogel (2008) and Weisberg (2010).<sup>22</sup> (See Weisberg 2012 for a survey of internalist and externalist responses to the bootstrapping problem.)

Let's consider an example. Take again the bootstrapping argument (1)-(6). Its non-deductive step is the one carried out by *S* from

(5) My colour experiences have always matched the actual colour of each of the *n* cards  
that I have viewed

to

(6) My colour vision is reliable.

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<sup>21</sup> Markie (2005) nevertheless denies it and contents that bootstrapping reasoning is only dialectically ineffective. See Cohen (2005)'s response.

<sup>22</sup> Weisberg interprets the bootstrapping problem as a general paradox. See note 10 above.



Vogel (2008) contends that the inference from (5) to (6) gets *defeated* because the whole reasoning (1)-(6) is *rule-circular*. Rule-circular reasoning uses a rule  $R$  to establish that  $R$  itself is reliable. In particular, the defeater is the following proposition, which Vogel thinks to be a priori true:

(NRC) A belief that an epistemic rule  $R$  is reliable cannot be justified by the application of  $R$ . That is, neither the conclusion itself nor any belief which supports the conclusion may be justified in virtue of the application of  $R$ . (531)<sup>23</sup>

Recall the initial steps of the bootstrapping argument:

- (1) The first card appears red to me.
- (2) The first card is red.
- (3) The first card is red and appears red to me.
- (4) Therefore, my colour appearance matches the actual colour of the card on this occasion.

We can think of (PC) as sanctioning a rule  $R_c$ , which states that if it appears to one that  $X$  has colour  $C$ , and one has no reason to doubt it, then one ought to believe that  $X$  has colour  $C$ . (6) can be read as asserting that  $R_c$  is reliable. Furthermore, note that  $S$  uses  $R_c$  to justifiedly believe (2) in the thought experiment. Since  $S$ 's reasoning (1)-(6) comes in conflict with (NRC) at its non-deductive step from (6) to (7), this step is defeated and cannot give  $S$  justification for believing (7).

In short, Vogel (2008)'s response to the bootstrapping objection is the following: since (NRC) is a defeater of the non-deductive inference from (6) to (7), and (PC) is *compatible* with

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<sup>23</sup> (NRC) is reminiscent of what Bergman (2000) calls the *no self-support principle*. Bergman interprets Fumerton (1995: 177) as endorsing it.

(NRC), supporters of (PC) are as such uncommitted to the non-deductive inference. So (PC) is not hit by the easy justification from bootstrapping objection.

As White (2006) has emphasized, however, not all rule-circular reasoning is bad. For instance, ‘doing well in a memory game can suggest that I have a good memory, even though I can’t help but use my memory to evaluate my performance’ (530). But (NRC) would disallow this kind of reasoning. A problem of Vogel’s view is that it doesn’t distinguish between good and bad rule-circular reasoning. Weisberg (2010) has also found out that there are (impermissible) bootstrapping cases that don’t instantiate rule-circularity, so they cannot be stopped by (NRC).<sup>24</sup>

A cursory examination of the principal responses to the bootstrapping objection discussed in the literature will show that they are all problematic to some degree. I cannot exclude that new proposals might turn out to be more straightforward.<sup>25</sup> Nonetheless, my view is that phenomenal conservatism doesn’t need any sophisticated defence of this type. The reason being that since seeming-based justification is elusive, the bootstrapping objection cannot get off the ground when directed to perceptual dogmatism. Consider again the argument (1)-(6). Note that *S* can justifiedly believe that

(1) The first card appears red to me

only if *S* is reflectively aware of her seeming that the card is red. Accordingly, if *S* also justifiedly believes that

(2) The first card is red,

this justification *cannot be based on S’s seeming that the card is red*. *S*’s justification for (2), if any, must be *reflective* justification — that is to say, justification based on *S*’s reflective belief that she has that seeming. Therefore, (PC) is off the hook at the outset.

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<sup>24</sup> See Cohen (2010) for further objections.

<sup>25</sup> An interesting one is Butzer (2017).

## 5.6 Conclusions

I have investigated the epistemological consequences of the fact that seeming-based justification is elusive, in the sense that a subject *S* can lose this justification simply by reflecting on her seemings and becoming aware of them. I have argued that because of this feature of seeming-based justification, *S* couldn't successfully appeal to (PC) to reject sceptical arguments that questioned her possessing seeming-based justification. I have also suggested that *S*'s seemings could not provide *S* with immediate justification for ruling out sceptical conjectures. These findings indicate that phenomenal conservatism doesn't give scepticism a fully satisfactory response. On the positive side of my investigation, I have shown that since seeming-based justification is elusive, phenomenal conservatism is not afflicted by easy justification problems. When seeming-based justification and reflective justification are held apart, it becomes apparent that neither the easy justification from closure objection nor the easy justification from bootstrapping objection strike phenomenal conservatism.

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