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FEATURE REVIEWS

Systematizing Nyāya

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Epistemology in Classical India: The Knowledge Sources of the Nyāya School. By Stephen Phillips. New York and London: Routledge, 2012. Pp. x + 194. ISBN 978-0415895545.

An ongoing effort, exemplified though happily not exhausted in the work of B. K. Matilal, is to present the best of classical Indian philosophy in a way that speaks to contemporary philosophical concerns, while still being historically and philologically responsible. *Epistemology in Classical India: The Knowledge Sources of the Nyāya School* by Stephen Phillips is expressly this kind of work. Phillips begins by explaining that his book is “for philosophers and students of philosophy, not for specialists in classical Indian thought” (p. 1). His project is to engage with a range of classical texts and contemporary philosophy, in order to offer the Nyāya theory of knowledge as a coherent system. A welcome feature of his introduction is a defense of this kind of study. He appeals to the nature of philosophical practice in Nyāya, which, over the centuries, defends and develops its central claims, its *siddhāntas*. Given this, specific Naiyāyikas speak not so much as individuals but as members of the tradition. “Thus,” Phillips claims, “to try to find a single coherent theory, which is admittedly an abstraction from a long series of texts, is in accord with the dominant attitude within Nyāya itself” (p. 1).

We should not misunderstand Phillips’ claim about the intended audience and think that *Epistemology in Classical India* is merely introductory and of little use to specialists in Indian thought. This book is, in effect, the distilled, coherent summary of decades of Phillips’ work on Nyāya, and on Indian epistemology more generally. This alone makes it relevant to those of us who work in Indian philosophy. When warranted, he also contends with views put forth by leading scholars, advancing the conversation on important matters of interpretation. The last chapter of the book offers the creative and philosophically sensitive argument that Nyāya’s epistemological system avoids many problems recognized in contemporary thought, and is therefore indeed worthy of philosophical consideration. It is not merely a summary of earlier findings but a contribution to the philosophical study of Indian thought.

The book is well structured to support its overall project. It is admirably concise and indeed short. The meat of the book, *sans* appendixes and supporting materials, is a little over one hundred pages. The endnotes cite relevant primary and secondary literature, filling out the streamlined discussion within the body of the text. In this

way, the book can serve as the basis of a useful program of study. One can, with great profit and without investing an inordinate amount of time, read Phillips' text, gaining a sense of Nyāya as a developed system, and, where desired, follow up on the literature within the notes, engaging more closely with relevant primary and secondary materials. This would be an ideal way, I opine, for a student or nonspecialist scholar to become proficient in Nyāya epistemology. The endnotes also serve to prevent a not uncommon mode of presentation of the Indian schools for nonspecialists as entirely disengaged from source texts. Phillips' account of Nyāya as a system of thought is no Platonic form, pristinely floating in heaven and divorced from the muddy ground of textual engagement. Even where he has to think creatively about how Nyāya would engage with problems that were not explicitly handled in the tradition, he looks for proof texts or at least footholds in the original thinkers by which he may ascend to constructive interpretation.

Nyāya Epistemology in Summary

Chapter 1 starts with a short conceptual and historical introduction to Nyāya within the Indian philosophical scene. The only quibble I would have with his short overview is the unqualified characterization of Vaiśeṣika as an atheistic tradition (p. 4). Though the *sūtrakāra* may have had no use for God, as is well known, Prāśastapāda and subsequent Vaiśeṣikas do give a place of privilege to Īśvara, not only as the initiator of the creation cycles, but also as the overseer of the functioning of karma. Given Phillips' own principle of system, noted above, which looks to the contours of the mature school and avoids an "originalist" bias that sees post-*sūtra* developments as mere external accretions to the "real" holdings of the school, he could have better contextualized the place of theism in Vaiśeṣika.

The bulk of chapter 1 is, in any case, a systematic overview of Nyāya's theory of knowledge. Chapter 2 continues this, focusing on the notion of certification or reflective justification, the highest grade of positive epistemic status that Nyāya allows for cognition. In summary, Phillips' systemization of Nyāya's epistemology is as follows: There are two levels of knowledge (*pramā*, "veridical cognition"). Ground-level "raw animal knowledge" (p. 5) is unreflective and consists in the possession of veridical cognition owing to the operation of a knowledge source (*pramāṇa*, identified as perception, inference, analogy, and testimony). The normative status of ground-level cognition is governed by externalist/reliabilist considerations. Being linked to the truth by functioning knowledge sources is enough for us to have knowledge, whether or not we have reflected on it at all.

The second level of knowledge is "self-consciously certified."¹ Factors like internal doubt or adversarial challenge trigger such self-conscious reflection and certification, which (typically) attempts to trace the causal origin of a doubtful cognition to a genuine knowledge source. The normative status of certified knowledge is governed by internalist considerations. One must consciously attend to the status of the cognition in question, identifying good reasons in support of it, which may serve to indicate that it is indeed *pramāṇa*-born. Importantly, as Phillips notes, certified knowledge

is entirely within the province of knowledge sources, as certification depends on the use of inference and, when needed, other *pramāṇas* (e.g., I may use my own perception and inference to certify my impression that a particular person is dishonest, but I may also include the testimony of others as solid evidence).

At this second level, Nyāya appeals to what Phillips calls “modest foundationalism” (p. 14), in that second-level reflective inquiry comes to an end by demonstrating either that a particular cognition is or is not *pramāṇa*-generated or (by using suppositional reasoning, *tarka*) that a particular doubt or challenge to belief is unworthy of being taken seriously, thereby bumping the individual back down to ground-level cognitive trust. Here, the chain of explanation comes to an end—again, a “modest” end, since good reasons for doubt could indeed bring this soft foundation into question and trigger further review. But in the absence of such reasons, we stop here (this process is summarized on pp. 18–19). Phillips cogently notes that unlike Cartesian foundationalism, Nyāya’s foundations serve as the *final* step of philosophical investigation. We only look for them when there is a problem, and when we find them we stop looking and return to our standard default trust, as illustrated by Nyāya’s famous metaphor of the lamp (*NS* 2.1.19, cited by Phillips on p. 18). While a lamp illumines other objects, it may be an object of knowledge should we seek to find it. So, too, may we make our own cognitions objects of knowledge if we desire to review and confirm them.

Phillips argues that this modest foundationalism is allied with a coherentism in that any information appealed to in second-order certification must come from a rich background of putatively *pramāṇa*-generated knowledge—this is ultimately all we have to appeal to. While he does not call attention to it, Phillips could have noted two further coherentist elements of Nyāya: (1) practically any such putative *pramāṇa*-generated knowledge is in principle capable of being reviewed and certified itself,² and (2) the mechanism of doubt and cognitive review is governed by negative coherence, violation of which triggers doubt and the move to reflective certification.³

One could question whether Phillips needs to invoke both modest foundationalism and coherentism to describe what is basically the same phenomenon: in the act of certification, we appeal to the putative deliverances of other *pramāṇas* (along with *tarka*, which is technically not a *pramāṇa*, but its assistant⁴) to evaluate the status of the cognition under review, and unless there is legitimate doubt about this further *pramāṇa*, the chain of explanation ends there. Phillips himself suggests that Nyāya’s modest foundationalism protects it from the charge of circular reasoning that besets coherentism: “there are just certain (quasi-) basic beliefs and not simply a circle of mutually supporting opinions” (p. 19). We may note that Nyāya’s “modest” foundationalism (later called “fallible foundations” and unpacked on pp. 20–23) simply amounts to default trust in unblemished presentational awareness (*anubhava*) of any kind, and is not a distinctive feature of second-level, certificational knowledge. My seeing a friend down the hall is foundational knowledge, which may be appealed to in support of other beliefs, to the degree that it has not been infected by legitimate doubt. Thus, though Phillips first invokes modest foundationalism in the context of second-level cognitive review and certificational knowledge (p. 14), he underscores

the fact that it applies to both levels of knowledge. The basicity of “foundational” belief or cognition for Nyāya is merely the default presumption of innocence accorded to any apparently blemish-free cognition. It is the property of all beliefs that are not rejected, dubious, or otherwise slated for review. To answer the question at the head of this paragraph, I do think that the two designations help underscore separate features of Nyāya’s second-level cognitive review: the foundationalism highlights the default trust in putative deliverances of *pramāṇas*, which ends the justificational regress in the absence of reasons for doubt, while the coherentism underscores the fact that in cognitive review we have nothing to appeal to outside the putative deliverances of *pramāṇas*.

A final internalist feature of Nyāya epistemology discussed by Phillips is a concern with “excellences” (*guṇas*) and “faults” (*doṣas*), a concern that arises in the context of cognitive review (pp. 23–24). These two are taken to be indicators of whether a cognition is truly the product of *pramāṇas* or not. We look to excellences and faults as respective indicators of both. For example, regarding a testimonial cognition, Jayanta suggests that one excellence is the benevolence of the testifier, while a fault would be her deceitful nature.

In short, then, for Phillips, Nyāya is *externalist* insofar as the operations of genuine knowledge sources provide us with ground-level “animal” knowledge (*pramāṇa*-born cognition) with no need for reflection. It is (*moderately*) *foundationalist* insofar as it allows blemish-free presentational cognition to serve as the stopping point of reflective inquiry. It is *internalist* insofar as second-level “certificational” knowledge requires conscious reflection and inferential support. It is *coherentist* insofar as cognitive review must appeal to the resources of other putatively *pramāṇa*-born cognitions. On the whole, Phillips’ systemization of Nyāya is successful and is an advance, synthesizing the essentials of Nyāya thought, which has been developed in bits and pieces by various Nyāya scholars (including himself).⁵

Knowledge Sources

The centrality of knowledge sources in both unreflective and certified knowledge having been established, chapters 3 through 6 focus on Nyāya’s four recognized sources of knowledge: perception, inference, analogy, and testimony, respectively. Discussing Nyāya’s view of perception as a phenomenally and conceptually rich capacity to gain information about a real external world, chapter 3 takes the reader through the most important Nyāya arguments (*contra* Yogācāra Buddhists, and in dialogue with Mīmāṃsakas) that concept-laden perception simply *is* perception, a taking in of the world, and is not an artificial mental imposition on what is in fact conceptually empty sensation. Phillips shows that the much-celebrated *nirvikalpaka pratyakṣa* plays no phenomenological role for Nyāya and is at most a theoretical posit to account for our ability to glean propositional content from the outside world: perception is fundamentally the seeing of some object(s) as qualified by some property (or properties). Usually such properties are correlated with concepts held in the memory of the perceiver, who deploys them in the act of perception (“That’s a tree,”

where some *x* is seen as qualified by the predication content “tree”). But in some cases (like one’s first experience of a previously unknown animal) we must have the capacity to glean concepts from the outside world directly, without an intervening deployment of a concept stored in memory.

Ironically, perhaps, Nyāya’s acceptance of non-conceptual perception is thus meant to *support* the view that our perceptually relevant concepts ultimately come “from the outside”—serving the opposite role of that given to non-conceptual perception by its Buddhist champions. Phillips’ further discussions of recognition, perceptual error, and apperception underscore just how powerful Nyāya takes perception to be: we have the capacity to perceptually recognize an occurrently perceived object as the same object seen yesterday. We have the capacity to perceive absences, which, like recognition, are informed by, but are not reducible to, the memory of previously experienced objects. And it is because of this profound capacity of perception to directly apprehend things, properties, our own mental states (through apperception, a subspecies of perception proper), substances, and indeed relationships of various sorts⁶ that Nyāya empiricism, as Phillips points out, does not collapse into idealism, as have other empiricisms, both Indian and European (p. 44).

Keeping with the focus of the book, Phillips’ discussion of inference (chapter 4) avoids excursions into classical Indian debate theory and other such topics, focusing on the way in which inference is an epistemic faculty, both for individuals as knowers and in the social dimension, where good arguments presented by others must be taken seriously since they are, in some way, normatively binding. Discussing the structure of inference, Phillips illustrates the main articulations by Nyāya as well as influential Buddhist logicians, while arguing that, for Nyāya at least, inferential procedure goes beyond case-based reasoning, requiring the knowledge and application of general rules of inference (p. 60). He also illustrates the way in which the important notion of *upādhi*, “inferential undercutter,” informs Nyāya’s theory of inference. An *upādhi* is a property that pervades the *sādhya* or thing to be proven in an inference, but that does not in fact pervade the *hetu* or prover put forth. For example, someone whose only experience of fire is of that which is made from wet or green lumber would think that wherever there is fire, there must be smoke. But in truth, while green or wet fuel pervades smoke, it does not pervade fire; only through the influence of the *upādhi* of “having wet or green fuel” can fire be a prover of smoke. Phillips calls attention to the way in which Gaṅgeśa’s theory of *upādhis* connects to his broader approach to epistemic warrant. While, *pace* skeptical claims, someone need not ferret out any and all potential *upādhis* before one can make a warranted inference, she must be attentive to possible *upādhis* for which there is some evidence. Even a suspected *upādhi* is enough to undermine an inference.

Phillips concludes by explaining, among other things, the rationale for Nyāya’s controversial use of inference based on negative correlation, and, usefully, by providing a handful of important examples of the actual inferences Nyāya employs in support of contested metaphysical issues (the self, God, and the possibility of liberation).

Analogy (chapter 5) has always been the outlier among the *pramāṇas*, having both a severely restricted scope and a convoluted causal sequence. While explaining

and endorsing the Nyāya account of analogy as an irreducible *pramāṇa* (p. 78), Phillips spends more time on tangentially related—but, in this reader’s opinion, more interesting—issues like the ways in which Nyāya and other Indian schools account for the referential and suggestive power of words. At the same time, given that Phillips is acting not only as a faithful historian but in many ways a creative and sympathetic Nyāya systematizer, it would have been helpful if, given the strangeness of analogy, which, as he notes, led it to be attacked on many sides and abandoned by the innovative Naiyāyika Bhāsarvajña, he had delved more fully into the criticisms and provided a fuller defense (or conversely, reasons why Nyāya should in fact abandon it).⁷ In the spirit of Phillips’ project, I would suggest that it should be jettisoned as a full-fledged *pramāṇa*. Indeed, I would argue that in the standard story that is told, analogy itself is a superfluous part of the cognitive sequence. The stock example involves someone’s learning that the word *gavaya* refers to water buffalo, on (1) the testimony that a *gavaya* looks like a cow, and (2) later, upon seeing something that looks like a cow, realizing that the term *gavaya* refers to the thing in view, a water buffalo (Phillips’ summary is on p. 75). The analogy is between the referent of *gavaya* and a cow, and the knowledge of this analogy allows one to recognize and know that the thing in view is called a *gavaya*.

To illustrate why analogy itself is superfluous in this kind of knowledge, we can imagine a case where someone who knows little about American football is told “people who stand on the sidelines of a football game, leading songs, dancing, and waving pom-poms are called ‘cheerleaders.’” The same person later goes to a football game, sees the cheerleaders, and remarks to himself “those are the people called ‘cheerleaders.’” In this case, there is no analogy employed to assist comprehension; the person is simply provided with characteristics or *lakṣaṇa* that indicate cheerleaders. Still, the process is otherwise identical to the case of the water buffalo: one is introduced to a name and given a description of its proper referents by a competent language user. He then comes to realize firsthand that the name applies to *this particular kind of thing* through current experience of the thing in question coupled with recollection of the distinguishing characteristics. If analogy is really constitutive of one of the *pramāṇas*, then in the cheerleader case would we need a fifth *pramāṇa*, which does not rely on analogy, but still engenders knowledge of the relationship between a name and a particular class of referents? The analogy at work in Nyāya’s example of the water buffalo is thus incidental, if the real issue at hand is the understanding of the relation between terms and their referents.

So much for analogy itself. But do we still need a special *pramāṇa* for this kind of knowledge of meaning or reference? I would say no. We can take the first level of knowledge in these sorts of stories, that of a term’s general use, which is provided by an authoritative language user, to be testimonial, like other instances of definitional knowledge. The second level of knowledge, in this example the recognition that “these specific people are cheerleaders,” which occurs upon seeing actual cheerleaders, could be a token of perceptual knowledge, which merely accords with and supports the original testimonial knowledge through a convergence of *pramāṇas*

(*pramāṇa-saṃplava*). What I knew by testimony has now become reinforced by my perceptual experience.⁸

We have seen above that Nyāya considers perception often to be richly informed by memory, without losing the status of being properly perceptual. Just like perceptual recognition (e.g., “that man is the same one I saw yesterday,” discussed by Phillips on pp. 38–41), this, too, could be perception that is informed by memory. In any case, taking analogy to be an independent *pramāṇa* is problematic, and in pursuance of Phillips’ constructive effort, I would suggest that it be either radically refined or, better, abandoned.⁹

The final knowledge source is testimony (chapter 6). Here, Phillips reiterates and defends the Nyāya view that the proper attitude toward others’ testimony is default trust in the absence of defeaters, not a tentative holding of the information until confirmation. As he felicitously puts it, on Nyāya’s account of testimony, “acceptance and understanding are normally fused” (p. 86), and to reject this approach would deprive us of much that we know (p. 82). Because of this, he notes, testimony provides the clearest example of Nyāya’s notion of ground-level unreflective knowledge, with the possibility of certification as needed. Phillips then considers the primary lines of argumentation developed by Nyāya in support of the irreducibility of testimony, while noting that many in the Western tradition, which was long skeptical and/or reductionistic about testimony as a source of knowledge, have started to embrace a view not unlike Nyāya. From here, Phillips guides the reader through the major Nyāya positions, in dialogue with other schools, on topics like requirements for sentence meaning, the nature of reference, the role of a speaker’s intention in disambiguating statements, and the operation of indirect speech. Briefly, but importantly, he follows Ganeri (1999) by arguing that Nyāya’s philosophy of language, though a direct reference theory, has the resources for something akin to Fregean *Sinn* insofar as reference, like perceptual cognition, targets a thing as qualified by a qualifier. “The qualifier in a general form may be called a word’s sense” (p. 87).

Nyāya’s Pramāṇa Theory as a Genuine Option

The final chapter argues that Nyāya’s theory of knowledge has the resources to deal with various problems and challenges advanced within contemporary analytic epistemology. Nyāya avoids the generality problem advanced against contemporary reliabilism by (1) defining *pramāṇas* as successful and thus one hundred percent reliable, simplifying the problem of reliability itself, (2) appealing to something akin to the notion of *pramāṇas* as cognitive natural kinds that are commonly recognized in ordinary thought and speech (with the exception of analogy—another strike against it¹⁰), and (3) identifying fundamental causal chains (and, implicitly, appropriate circumstances of usage) that govern each *pramāṇa* subtype (pp. 24–30, 44–48, 101).¹¹

Against a host of causal objections to reliabilism, which in common allege that even reliable cognitive processes can fail to produce knowledge, since an individual may not be personally justified or subjectively rational in trusting them, Phillips

argues that Nyāya's two-tiered epistemology has the capacity to counter the objections while doing justice to the intuition that motivates them. First, Nyāya can simply deny that subjective rationality is necessary for the lower "animal" knowledge. Ground-level knowledge simply requires a cognitive faculty that ties one's cognition to the truth (p. 98). This is why, we may add, small children and even higher animals could be said to know some things. Still, Nyāya shares the concern for subjective rationality, requiring it for the "certificational" portion of epistemological practice. This is why someone does not have higher, certified knowledge if she either has no access to the functioning of, or a reason to doubt, her reliable cognitive faculty. Still, this is not a prerequisite to gain ground-level knowledge from the spontaneous deliverances of knowledge sources.

Regarding the "fake barn country" problem, Phillips has two responses. First, he reminds the reader that Nyāya is concerned to identify faults (*doṣas*) that undermine apparently veridical perceptual cognition, including, for example, a medium-sized object's being too far away. Nyāya, he argues, could easily add the following to the situation: the presence of various F-looking things that are not Fs within the local perceptual environment. Second, he argues that if the cognition of an actual barn is informed by the memory "Now that's a fine barn [compared to others we have been seeing]" it is non-veridical since it is misinformed by memory. This second way is less helpful. The parenthetical content Phillips provides for the visual experience is really immaterial. The fundamental problem brought forth by the fake barn example involves epistemic luck—a person happens to accurately perceive a barn when, in this local environment, it could easily have been otherwise without her noticing. The cognition is not safe. The bit about memory is really not getting at the main issue. A possible third line of response, not mentioned by Phillips in this context (but a related one; see p. 142 n. 39) is Nyāya's recognition that *pramāṇas* function in environment-specific ways. Against the Mīmāṃsā view that the justification-conferring features of cognition are entirely internal to it (see note 3 above), Nyāya argues that in unfamiliar conditions, even blemish-free veridical cognition may remain doubtful and fail to count as knowledge. This could be developed to exclude cases like that of fake barn country, which trade on conditions which mimic and yet deviate from ordinary environments.

Phillips deals with the new-evil-demon objection by agreeing that the one in such a world could, by Nyāya lights, "appea[r] to be justified" (p. 101), trusting the misleading semblances of *pramāṇas* (*pramāṇa-ābhāsa*). But she has neither knowledge nor certification on the Nyāya schema. The notion of *pramāṇa-ābhāsa* suggests something that is a false but apparently true cognition. Commonly, we only recognize the presence of a *pramāṇa-ābhāsa* in retrospect, after gaining new information that invalidates the previous, apparently trustworthy cognition. The term *ābhāsa* conveys the notion of a semblance of the real thing, which, in the language of contemporary epistemology, allows for some degree of justification, which would allow for something like subjective rationality or justification, despite lacking first- and second-order knowledge.

Directions for Further Research

Closing the final chapter, Phillips identifies a handful of epistemological topics that are, in his estimation, weaknesses within the Nyāya system: (1) the lack of a formula for determining degrees of warrant,¹² (2) an underdeveloped account of the way in which disagreement has an impact on justification, and (3) a lack of concern with or awareness of a priori knowledge as a distinct category. We will close by considering these, along with a further topic that, I think, looms in the background of our attempts to try to reconstruct the Nyāya system as informed by contemporary epistemology: the apparent lack of a proper concern for agent-centered epistemic normativity. Regarding the a priori I have little to add, as Phillips' discussion deftly explains why Nyāya is indifferent to the idea of a priori knowledge, typically reducing it to knowledge of the meaning of words, while also accounting to some degree for why this is reasonable given Nyāya's empiricism, and finally identifying places where some resonances with a priori knowledge may be located (including "negative-only" inferences).

Regarding degrees of warrant, it is correct that Nyāya may be said to hold a "threshold theory" of positive epistemic status, not a "degree theory." Cognitions are either in or out of the privileged circle. And this, to be sure, does seem to conflict with the fairly common view that justification or warrant comes in degrees, a position supported by reflection on standard epistemic practices.¹³ I would agree with Phillips that Nyāya's account is underdeveloped. But I would add that Nyāya does not deny that we have varying degrees of confidence in cognitions as they manifest themselves; the epistemic status of cognition manifests itself with varying force. In support of this, we may note that Nyāya holds that cognition that has been certified or reinforced by a convergence of *pramāṇas* is more secure than that which has not. Such "reinforced" cognitions are not exactly more *prāmāṇya* or *yathārtha*, but they are more resistant to doubt. Vātsyāyana (*NB* 3.2.55; *ND* 815) thus defends a section of the *Nyāya-sūtra* that repeats topics settled earlier, claiming "As truth is repeatedly investigated, it becomes more established."¹⁴ Uddyotakara makes a similar claim in the opening to his commentary on *NS* 1.1.10. But more importantly, Nyāya incorporates into its theory of doubt (*samśaya*) the fact that cognition strikes us with varying degrees of epistemic force, thereby providing the conditions under which cognitions within a certain range must be reviewed. Therefore, perhaps the resources for dealing with the question of degrees of warrant is not to be found in Nyāya's conception of *pramāṇa*, which is ultimately disjunctive, relational, and "binary,"¹⁵ but, instead, in its account of doubt—a central feature of our cognitive lives.¹⁶

Given the fact that doubt is so important to Nyāya—it is one of the sixteen central topics listed in *NS* 1.1.1—and indeed, as it is the trigger that initiates the transition from ground-level trust in cognition to self-conscious certification and review,¹⁷ I think that it could have been given a fuller treatment by Phillips. I would like to look at it briefly, while suggesting how it speaks to both the problem of degrees of warrant and the epistemic role of disagreement. The procedure of the *Nyāya-sūtra* itself

illustrates a somewhat formal approach to doubt as part of a rule-bound discussion or debate, often following the following schema: (1) introduction of a philosophical topic, (2) elucidation of reasons for doubt in the standard Nyāya position, and (3) resolution of the doubt by deployment of *pramāṇas* and *tarka*. But despite this, its definition of doubt centers on the practice of individual epistemic agents:

Doubt is an unsteady awareness, in want of a distinguishing cognition, produced by awareness of common property, of an uncommon property, or by conflicting opinion, which are qualified by uncertainty regarding cognition and non-cognition. (NS 1.1.23; ND 234)¹⁸

Generally, a doubtful cognition is typified as having predication content amenable to multiple, incompatible objects, ascribed to a single locus, coupled with an inability of the subject to apprehend a property unique to one of the options that would settle the case. A stock example of a doubtful cognition is the perceptual presentation of something in the distance that could be either a person or a post. Uddyotakara argues, following the *sūtra*, that in cases like this there are three individually necessary and jointly sufficient conditions for doubt: (1) lack of awareness of a uniquely distinguishing property of the object being cognized; (2) awareness of its being qualified by a property compatible with various, exclusive property-bearers; and (3) lack of certainty from cognition or lack of cognition, which could settle the case.¹⁹ Doubt triggers a move to second-level reflection, since a cognition to which one would be entitled by the (presumed) operation of a *pramāṇa* loses such entitlement in the face of doubt.

Now, back to the question of degrees of warrant: as explained in leading accounts, while doubt is spoken of as something that plagues a cognition or a tenet of some kind, it is ultimately subject-and situation-dependent, and therefore can change as the conditions of the epistemic subject change. My apparently veridical perceptual cognition that my friend Ben is in the park may be doubtful now, given the fog in the air or my distance from him. But a cognition with the same content, perceptually targeting *that person* under the qualifier “my friend Ben,” may not be doubtful if I close the gap a bit. Or, perhaps, it may be *less* doubtful. Here, the truth-value of the cognition is the same (I stipulate that they are both veridical cognitions, *yathārtha*). But the epistemic status of the cognition is different in the case where I am beset by unfavorable conditions which inhibit certainty and give rise to doubt. Thus, there is a range within which cognition, whether true or not, has varied epistemic status as it strikes the subject. Admittedly, this would need to be developed to fully account for a notion of degrees of warrant. Or perhaps it may be unpacked in terms other than warrant. But my suggestion is that the fundamental resources are there to handle the problem of degrees of normativity accorded to cognition. And in tandem with Nyāya’s approach to epistemology as meant to guide us in our pursuit of life’s goals, there may be ample scope to consider an informal metric of sorts by which the pragmatic needs of a situation, coupled with the epistemic force of the cognition or belief in question, allow for action to be guided by less than certainty.²⁰

Now, the role of disagreement: it is particularly noteworthy that *vipratipatti*, opposing views, is recognized in *NS* 1.1.23 as the third trigger for doubt. Uddyotakara states that in cases of doubt caused by conflicting opinion, as opposed to something like unclear perceptual presentations as discussed above, contrary opinions or assertions take the place of condition (2), the awareness of something's being qualified by a property compatible with various property-bearers. Vātsyāyana's example suggests a philosophically informed perspective, and not a mere contrary claim:

One school holds that there is an indwelling self. Another holds that there is no indwelling self. It is impossible that both obtain simultaneously, and in the absence of a proof in support of either one, there is an absence of definitive ascertainment of the truth, which constitutes doubt. (*NB* 1.1.23; *ND* 241)

Peer disagreement thus triggers doubt. But how far to go with this? Given the ubiquity of well-known, opposed opinions among classical Indian thinkers, this could lead to a kind of philosophical skepticism of the sort developed by Feldman:

[There] are cases in which one is tempted to say that 'reasonable people can disagree' about the matter under discussion. In those cases, I think, the skeptical conclusion is the reasonable one: it is not the case that both points of view are reasonable, and it is not the case that one's own point of view is somehow privileged. (Feldman 2006, p. 235)

This view, however, is not embraced by Nyāya, which in practice maintains entrenched opposition to other schools and thinkers who have similar philosophical acumen (indicating that they are likely to be epistemic peers) and who usually remain unconvinced of Nyāya's position. But I have not found much discussion in the classical sources on when a challenger may be ignored without violating epistemic norms. Clearly, challenges that conform to the classically accepted notions of *pramāṇa* defeaters are legitimate. Other challenges, and particularly certain kinds of skepticism, are held to be unreasonable. Still, Nyāya does respond to the latter, trying to illustrate why they are unreasonable (charging them, for example, with pragmatic self-contradiction, or by use of arguments from the parasitism of falsity upon truth). Nyāya seems to hold that opposition to a position that has been successfully defended need not trigger doubt unless relevant objections to undefended aspects of the position arise. Thus, while Phillips is correct that the role of disagreement's impact on justification is not "entirely clear" (p. 101), we should take note of the fact that, from the *sūtras* on, Nyāya is aware of the way in which disagreement is a leading cause of doubt and cognitive review. Therefore, the resources to form an epistemology of disagreement may be found elaborating on the leads within the tradition itself.

I would like to close by considering an issue that lingers in the background of many of our attempts to wrestle with Nyāya epistemology in the light of contemporary thought: Nyāya's apparent lack of sustained concern with agent-centered epistemic normativity or agent-justification, that is, with the assessment of an individual knower's performance as an epistemic agent. By contrast, we see that from the early modern period, the Western tradition, as illustrated by Plantinga (1993, pp. 11–29),

exhibits a profound concern with the epistemic duties of individual knowers and the criteria to assess them thereby. Recognizing this internalist, individualist, and deontological inheritance helps explain why it makes sense to us to be concerned with there could be situations of massive cognitive failure, where one can be radically wrong about most things, yet still be subjectively rational and thus justified. And while “justification” has had a remarkable range of meanings, historically it is still tethered to the basic question “why is it right to believe x?” Even after the recent rise of reliabilism, externalism, and various attempts to naturalize epistemology, we have again seen a return to the agent in the form of virtue epistemology, an epistemological program that grounds cognitive success in agential competence exercised in appropriate conditions.²¹ Against this background, some scholars of *pramāṇa* theory have bemoaned its apparent absence of concern with agents in knowledge-gathering practices.²² In other cases, when some suggest that agent-centered normativity is present, it seems more like an abstraction and suggestion of what *should be there* as entailments of Nyāya’s views, rather than what is developed in the original thinkers themselves.

What to make of this apparent lacuna? I am inclined to hold out a bit and wait. By this I mean that perhaps this situation is akin to Nyāya’s defense of testimony, its process reliabilism, or its theory of default trust in cognition—things that may have seemed strange or out of place to many Western thinkers (owing largely to their own internalist, deontological, and individualist approach to epistemology), but to which the mainstream Western tradition finally caught up.²³ Perhaps Nyāya’s restricted concern with agent-centered epistemic normativity is a better approach. In a demon world we would be lost, subjective rationality be damned. Though one may be doing her best in such circumstances and perhaps be faultless from an internalist or deontological perspective, she would fail to be a *knower* (*pramātrī*), and therefore she does not partake of high-grade epistemic status. At the same time, following the lead of Phillips (and Patil, as well as others), we may identify and reflect on those aspects of cognitive practice where Nyāya locates some space for agent-centered epistemic normativity. I would suggest the following three.

1. In deliberate and reflective use of inference.
2. In sensitivity to the kinds of situations and conditions that trigger doubt and review of cognition.
3. In review and certification, which arise post-doubt.

Regarding deliberate and reflective inference, though Naiyāyikas do not normally express positive epistemic status in deontological language, as discussed by Phillips (pp. 14–15), they clearly hold that one should abide by the canons of right reasoning and recognize fallacies of various kinds.²⁴ This is underscored by the care taken in the Nyāya literature, beginning with the *sūtras* themselves, to identify fallacies and argumentative dead-ends.

The importance of sensitivity to the kinds of situations and conditions that trigger doubt and review of cognition is evinced by Nyāya’s extensive discussions of

epistemic defeaters of various sorts. Moreover, implicit in the treatment of doubt and review is the contention that one should be dubious of incoherent cognitive presentations and instances of incoherence within one's own cognitive structure. It is wrong to be careless or indifferent to such matters.²⁵ There is a core personal responsibility expected of mature, competent epistemic agents. They must recognize and respond to instances of doxastic incoherence or potential defeaters (including, for example, the dubious authority of a testifier) when brought to attention, and likewise be sensitive to incoherence within experience, withholding judgment about doubtful cognitions until their status has been settled.²⁶

Finally (as illustrated by Phillips), much of an epistemic agent's status is determined by her performance in second-order practices, which involve review and confirmation of putatively veridical cognitions. If such review is carried out reasonably, according to norms of rational review, one is acting as a good epistemic agent.

Notes

Abbreviations

- NB* *Nyāya-bhāṣya of Vātsyāyana*. See Gotama et al. 2003. (*Vātsyāyana's Bhāṣya*).
- ND* *Nyāya-darśana*, edited by Taranatha Nyāya-Tarkatirtha and Amarendramohan Tarkatirtha. See Gotama et al. 2003 (*Nyāyadarśanam: . . .*).
- NS* *Nyāya-sūtra of Gotama*.
- NV* *Nyāya-vārttika of Uddyotakara*. See Gotama et al. 2003 (*Uddyotakara's Vārttika*).
- NVT* *Nyāya-vārttika-tātparya-ṭikā of Vācaspati Mīśra*. See Gotama et al. 2003 (*Vācaspati Mīśra's Tātparyaṭikā*).

- 1 – Let us note in passing that while Phillips suggests that *nirṇaya* is Nyāya's technical term for this reflective, certified knowledge (pp. 5, 19, 106), the term has some fluidity in the original sources. *NS* 1.1.41 defines *nirṇaya* as the determination of an issue after reflection upon supporting and opposing considerations, which certainly supports Phillips' usage. But commenting on the text, a number of leading Naiyāyikas expressly claim that *nirṇaya* can be the product of ground-level unreflective epistemic practice. Indeed, it is in the specific context of explaining the concept of *nirṇaya* that early Naiyāyikas express their theory of default, unreflective justification. Vātsyāyana notes that in the act of perception (for example), an immediate, unreviewed cognition born of the contact between sense faculty and object is *nirṇaya* (*NB* 1.1.41). Uddyotakara is more explicit: "some claim that definitive ascertainment is simply inferential, that it is nothing more. We deny this. . . ; in the absence of inference, definitive ascertainment may be produced as the result of the mere functioning of a *pramāṇa*" (*NV* 1.1.41; *ND* 333–334). My impression is that while clearly Nyāya identifies

two ways of gaining knowledge, corresponding to the two levels articulated by Phillips, there are not two clear and consistently employed terms used for the two kinds of knowledge.

- 2 – Another Nyāya metaphor brings this point home: “A scale, which is a source of knowledge, may be an object of knowledge as well” (NS 2.1.16). Vātsyāyana comments that a bit of gold is an object of knowledge when weighed by a scale. But once its weight is securely ascertained, it may be used to determine whether other scales are properly calibrated. In the latter case, the scale itself is the object of knowledge, which the bit of gold “measures.” Clearly, a reflective equilibrium is in play here. There are a few relevant exceptions to this approach, pertaining to cognitions that are considered fundamentally unchallengeable; see Chakrabarti 1984 for discussion.
- 3 – A final concern worth exploring, tied to Nyāya’s coherentism, is the question of *svataḥ-prāmāṇya* (“intrinsic veridicality”) versus *parataḥ-prāmāṇya* (“non-intrinsic veridicality”), briefly mentioned by Phillips (p. 134 n. 8). Mīmāṃsā and Nyāya champion the two views, respectively, meaning that for Mīmāṃsā an instance of cognition evinces its veridicality “from within,” independently of support added by other cognitions, while Nyāya holds that (with some important exceptions) the veridicality of cognition is established within a tacit network of support by other putatively *pramāṇa*-born cognitions. The two would, on the surface of things, seem to lean toward something like foundationalism and coherentism, respectively. What is particularly interesting given this distinction is that *both* Nyāya and Mīmāṃsā defend a default, unreflective entitlement to undoubted cognition, what Phillips describes as modest foundationalism. Given this, I would like briefly to discuss the considerations by which they respectively come to this position because it illustrates the way in which a similar position may be developed by very different considerations.

The foundation of the *intrinsic* position was laid by Śabara, the pioneering commentator on the *Mīmāṃsā-sūtra*, who argues that Vedic testimony produces cognitions with default *prima facie* justification simply due to its producing (*avabodhayati*) determinate, contentful cognitions (*Śabara-bhāṣya* 1.1.1.2). Mīmāṃsakas extend this principle to all putatively veridical presentational cognition. As I understand it, their contention is that the nature of cognition is to reveal information, and as such there is incongruence between its revelatory nature and its being *prima facie* false or even doubted. External information could serve to falsify it, but is not needed to support it (see Arnold 2005, pp. 64–65, for a summary of this argument; see Taber 1992 for a study of its development in Kumāriḷa and leading Bhāṭṭa thinkers). There are clear affinities between this approach and a line of thinking advanced by Burge (1993, p. 471), that “the very content of an intelligible message presented as true” has an a priori *prima facie* connection to truth, and is therefore worthy of default entitlement; perhaps also affinities to Pryor’s notion of the “phenomenal force” of cognition, which underwrites default entitlement (2000, p. 536).

Nyāya's defense of default entitlement to cognition tends to be more pragmatic. As Phillips notes, Nyāya's concern with epistemology has a deeply pragmatic motivation: we are concerned with correct cognition because we want to achieve our life-aims (pp. 19–21). But if we start with doubt, we will waste our time mucking around in the foundations, unable to achieve our goals (see Vācaspati's comments on the limits of doubt in *NVT* 1.1.5; *ND* 139). This may be fruitfully compared to the notion advanced by Enoch and Schechter (2008) that we are pragmatically justified in depending on our basic belief-forming methods because they are indispensable in our pursuit of rationally required projects. Also compare to similar remarks by Alston (1991, pp. 150, 168). Allied with this, Nyāya refutes default skepticism through its arguments from parasitism, which try to establish that error and doubt are conceptually parasitical upon truth, and therefore trust in apparent truth is rightly our cognitive starting point (see Dasti 2012 for an exploration of these arguments).

- 4 – *NB*, Introduction; *ND* 53–55. Vātsyāyana notes that the reason *tarka* is not an independent *pramāṇa* is that it does not independently establish the nature of the thing in question (*anavadhāranāt*). It provides consent (*anujānāti*) for one of two alternatives independently supported by apparent *pramāṇas* by illustrating problems with the other of the two alternatives.
- 5 – While many published works have provided insights into structural features of Nyāya's theory of knowledge, few have provided systemizations of the entire theory and, further, specifically engage with contemporary epistemology. Patil (2009, pp. 31–56) provides one of the few attempts in recent literature. (He does note, though, that he is primarily focusing on the overview given in the Nyāya textbook *Tarkabhāṣā* and in the *pūrvapakṣas* of Ratnakīrti, and does not claim to interpret the main lines of Nyāya thought in historical overview). In my opinion, his analysis of the main contours of Nyāya epistemology is largely right and is, for that matter, largely akin to that given, with more elaboration, by Phillips. But in the matter of framing Nyāya in the categories developed by contemporary epistemology, I do think that Phillips' account is more apt, for the following reasons: (1) Patil differentiates between the two levels of Nyāya's cognitive practice by claiming that the ground level is reliabilist and the second-level internalist and foundationalist, with the former providing knowledge but the later justification. But for Nyāya, the dependence on knowledge sources (and thus process reliabilism) exists in any instance of knowing, even reflective certificational knowledge. Our second-order certificational knowledge must also be the product of a reliable process, typically inference. Patil's choice of nomenclature does not capture this as well as Phillips' distinction between externalism and internalism, while stressing that both take place within the domain of knowledge sources. (2) Patil's use of "foundationalism" to distinguish the second level certificational practice does not sufficiently highlight the fact, to which Phillips calls attention, that the regress-stopping default trust in blemish-free presentational cognition operates on *both* levels equally. Finally, (3) Patil

argues that Nyāya takes justification, what is produced by second-level successful review of cognition, to be “the property of an agent and only derivatively a property of an awareness-event.” While he is right to be concerned with the status of the agent in acts of knowing (something arguably underdeveloped by Naiyāikas, as we discuss further below), it is not clear that Nyāya speaks of individuals as “justified.” Phillips rightly notes that agent-centered attention to reasons governs the second level certificational practice, but the primary concern throughout is the epistemic status of the original cognition itself.

I want to underscore that these criticisms are minor, as Patil’s analysis is on the whole accurate and deeply insightful. But in the choice between the two competing applications of contemporary epistemological terminology, I would endorse Phillips.

- 6 – Indeed, as mentioned by Phillips, and expertly discussed in Chakrabarti 2010, Nyāya solves the problem of induction by appeal to perception: we have the capacity to grasp many universals by means of (an admittedly special) perceptual capacity. And since universals underwrite causal laws, we gain cognitive access to laws of nature through such perception.
- 7 – For example, Phillips criticizes Nyāya’s claim that the capacity of language known as *dhvani* (“suggestion”) is nothing more than a kind of inference (p. 94).
- 8 – One may argue that the original statement by the authoritative speaker only provided a general understanding of what cheerleaders are, but not the knowledge that “these very people are cheerleaders,” which requires perceptual experience. But this would be a confusion. Consider another example: we infer fire on the hill, and then walk over and actually see it. As Nyāya would say, we first have inferential cognition and then a convergence of *pramāṇas* through the second, perceptual cognition, which reinforces the first. Why not treat the two parts of what is taken to be analogy in the same way?
- 9 – We may note here that Phillips adds an appendix to the volume which is a translation of the Analogy chapter of Gaṅgeśa’s *Tattvacintāmaṇi*. It indeed serves to illustrate the rigor and philosophical cogency of Gaṅgeśa’s analytic method. I do wonder though, why this, of all options, would be chosen as the text by which readers may get their first engagement in reading Nyāya directly. Other portions of Gaṅgeśa, like sections of his *Prāmāṇya-vāda* (“Analysis of Veridicality”) would have, I think, served better in speaking to the primary concerns of epistemologists and students of epistemology who will read Phillips’ book. I would advise readers interested in more relevant portions of Gaṅgeśa’s work to consult Phillips and Ramanuja Tatacharya 2004. Let me add that the inclusion of the chapter on analogy perhaps serves a larger aim than that of this present book: to contribute to Phillips’ project of ultimately making the entirety of Gaṅgeśa’s text available to the English-reading world.

- 10 – Indeed, one argument advanced against analogy by Bhāsarvajña appeals to the fact that in common speech, we recognize our cognitions to be produced by perception, inference, and testimony, but never by a specific faculty called “analogy.” See Chattopadhyay 2009, p. 156.
- 11 – We may note that here Nyāya anticipates Alston, who suggests that “there are fundamental considerations that mark out, for each process token, a type that is something like its ‘natural kind’” and that “by virtue of being a *functional* mapping of input features onto output content, [a reliable process] has a *built in* generality that is provided by the function . . . [and] is the one defined by the function, which is in turn defined by a certain way of going from input features to output features” (2000, pp. 360, 363). Conee and Feldman (2000, p. 377) push back against this approach, arguing that individuation by natural kinds still fails to resist the generality problem: process tokens may belong to many natural kinds, and therefore there is no compelling reason to claim that such tokens belong to a single kind for the purpose of evaluating reliability. This does not seem like much of a problem to me. As Vātsyāyana remarks in his comments on NS 2.1.20 (quoted by Phillips on pp. 18–19), we do tend to have a fairly good, intuitive handle on the most important natural kinds to which *pramāṇas* belong for the purposes of evaluation. When gauging the reliability of my teacher’s testimony, I do not become confused by the fact that it belongs to the category “sound vibration” or “things said within a building.” We are not, as Alston remarks, “awash in a sea of indeterminacy” (2000, p. 360).
- 12 – This concern has been voiced by others, including Oetke (2003, pp. 207, 214–215), who argues that “a ‘binary’ notion of validity, i.e. a notion which admits only for the two values ‘valid’ and ‘non-valid’ is insufficient. . . .”
- 13 – See Plantinga 1993, pp. 4, 109–110, and Alston 1999, p. 223.
- 14 – *bahudhā parikṣyamāṇam tattvaṁ suniścitataraṁ bhavati.*
- 15 – See Dasti and Phillips 2010.
- 16 – A further place to look, as suggested by Phillips (p. 101), is in Nyāya’s employment of *tarka* as a method of addressing the status of a disputed cognition by appeal to issues of coherence. See Ganeri 2001, pp. 151–152, for a sensitive treatment of this role of *tarka*.
- 17 – Uddyotakara thus remarks that doubt is “an essential component of investigation (*vicāra-aṅga*)” (NV 1.1.23). Further, “while there is no rule (*niyama*) that doubt must precede definitive ascertainment (*nirṇaya*), it must precede investigation (*vicāra*)” (NV 2.1.1). Reflecting on the traditional ordering of Nyāya’s topics of study (NS 1.1.1), Udayana suggests that doubt is listed before the individual steps of reasoning because doubt is itself the occasion for careful reasoning (*Nyāya-vārttika-tātparya-pariśuddhi* of Udayana 1.1.23 [Udayana 1996]). For a classic treatment of doubt in Nyāya, see Mohanty 1965. Also see Potter 1977, pp. 170–172.

- 18 – *samāna-aneka-dharma-upapatter vipratipatter upalabdhy-anupalabdhy-avyavasthātaś ca viśeṣa-apekṣo vimarśaḥ samśayaḥ*. In my translation, I have followed Uddyotakara’s interpretation.
- 19 – While the third condition may seem superfluous, Uddyotakara and Vācaspati offer the following example in its defense: A person visually apprehends a tree at close range. After distancing himself from the tree, he now sees it as something tall but otherwise unclear. He no longer apprehends the properties that distinguish it, and he does apprehend a property that it shares with other things (tallness). In this, the first two conditions are met. But no doubt arises, since his former decisive cognition prevents uncertainty. This last condition importantly underscores the role of background information as it impinges on occurrent cognition.
- 20 – Jayanta seems to be quite sensitive to the role of pragmatic concerns in relation to doubt, review, and decision making. Among other things, he notes that for common endeavors that are easy to undertake, cognitive review is not as important as those in which the endeavor is strenuous or the stakes are higher in some other way (Jayanta Bhaṭṭa 1969, p. 481). Also relevant is the following passage from the *Tarkabhāṣā*: “Someone acts on the basis of a doubtful cognition, and later, finding water or the like, determines that the original cognition was veridical” (*kaścit tu sandehāt pravṛttaḥ pravṛtti-uttara-kāle jalādi-pratīlambhe sati prāmāṇyam avadhārayatīti*) (Keśava Miśra 1979, p. 150).
- 21 – Sosa (2007) is paradigmatic. Given that Sosa’s epistemology also recognizes two tiers of knowledge, animal and reflective, there seems to be scope for comparison and engagement between his view and Nyāya’s.
- 22 – Notably Oetke (2003), whose concerns range wider than those that I mention here. As an aside, let us note, however, that Nyāya consistently speaks of knowing as a manifestation of the individual’s agency. Knowledge (*jñāna*, etc.) may be a *guṇa* and not a *karman* for Nyāya, but the processes that give rise to knowledge are clearly agential. Nyāya tends to develop this point in terms of the metaphysics of selfhood (e.g., in the anti-Sāṃkhya polemics of the third book of the *Nyāya-sūtra*) and without robustly connecting it to its epistemology. See my “Nyāya’s Self as Agent and Knower” (Dasti forthcoming) for discussion.
- 23 – For example, given the recent explosion of interest in testimony within analytic epistemology, it is interesting to note the embarrassment with which Surendranath Dasgupta mentions the subject in his celebrated *History* almost a century ago:
- Śabda or word [testimony] is regarded as separate means of proof by most of the recognized Indian systems of thought excepting the Jaina, Buddhist, Cārvāka and Vaiśeṣika. A discussion of this topic however has but little philosophical value and I have therefore omitted to give any attention to it in connection with the Nyāya, and the Sāṃkhya-Yoga systems. . . . Evidently a discussion of these matters has but little value with us, though it was a very favorite theme of debate in the old days of India. (Dasgupta 1975 [1922], p. 394)

- 24 – What is normally translated as *inference*, *anumāna*, may be either an immediate, unreflective, non-testimonial awareness of something beyond current perceptual cognition, generated by successfully navigating conceptual relations, or it may be a deliberate consideration of proof and entailment, terminating in awareness of an unperceived fact or object. The first case seems much like Dretske’s (1994) notion of indirect perception as it occurs in a sub-personal, immediate way. In the latter case, agent-centered normativity has a more prominent role, since an agent must actively consider inferential relations, entailments, and defeaters. See Vātsyāyana’s closing comments on *NS* 2.1.38, that when one infers poorly, “the fault is with the person himself.”
- 25 – This claim needs qualification. There are surely instances where a subject is not blameworthy for her insensitivity to relevant defeaters, owing to cognitive defects for which she is not responsible (e.g., blindness or poor training).
- 26 – In contexts of debate, Naiyāyikas express disapproval at opponents for not abiding by what are taken to be norms of right reasoning and sensitivity to defeaters. For example, Vācaspati chides an interlocutor who rejects Nyāya’s position without proper argument: “you cannot simply drive [my argument] away with a stick” (*NVT* 4.1.21). In other words, rationality dictates that the opponent provides sufficient argumentation in support of his rejection. In private conversation, Stephen Phillips has called attention to the fact that even if one’s inferential cognition is veridical, Nyāya holds that awareness of a well-supported, undefeated counterargument (*sat-prati-pakṣa*) is enough to reduce it to *apramā*, non-knowledge.

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