

“Defeating the Self-Defeat Argument for Phenomenal Conservatism”  
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*Abstract:* Michael Huemer has argued for the justification principle known as phenomenal conservatism by employing a transcendental argument that claims all attempts to reject phenomenal conservatism ultimately are doomed to self-defeat. My contribution presents two independent arguments against the self-defeat argument for phenomenal conservatism after briefly presenting Huemer's account of phenomenal conservatism and the justification for the self-defeat argument. My first argument suggests some ways that philosophers may reject Huemer's premise that all justified beliefs are formed on the basis of seemings. In the second argument I contend that phenomenal conservatism is not a well-motivated account of internal justification, which is a further reason to reject the self-defeat argument. Consequently, the self-defeat argument fails to show that rejecting phenomenal conservatism inevitably leads one to a self-defeating position.

The principle of phenomenal conservatism is an alluring principle for epistemic justification. The principle states that if it seems to a person that something is the case, then, in the absence of defeaters, that person has at least some degree of justification for believing it. Michael Huemer has recently argued that phenomenal conservatism is a simple way for internalists to justify non-inferentially various beliefs such as sensory beliefs about the world, mnemonic beliefs, introspective beliefs, intuitive beliefs, and various others.<sup>1</sup> One of the most philosophically intriguing arguments Huemer employs in defense of phenomenal conservatism is that it is self-defeating to reject phenomenal conservatism. That is to say, that if phenomenal conservatism is false, then there are no justified beliefs (including the belief that phenomenal conservatism is false). This essay will argue that Huemer's self-defeat argument for phenomenal conservatism is unsound.

### 1. Phenomenal Conservatism

Phenomenal conservatism uses *seemings* or *appearances* to ground justification. Huemer understands *seemings* to be a kind of propositional attitude. Probably the best

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<sup>1</sup> See Huemer (2001), pp. 98-115; and Huemer (2007).

way to get a grip on what Huemer means by *seeming*-states is by example. *Seemings* are a kind of propositional attitude that can be found in sensory experience, apparent memory, intuition, and apparent introspective awareness. Moreover, the state of seeming that something is the case is a different state than when a subject is in the state of believing that something is the case. The difference between *seeming* and *believing* can be illustrated by examples where we are inclined to say a person can have the *seeming*, but not the *belief*. For example, it can seem to me as if I've fed my dog this morning, but I may not believe it, because I know I have a poor memory. Consider also the experience of the Müller-Lyer illusion, where two lines *seem* to be of unequal lengths, but where the subject (who is familiar with the illusion) does not believe that the lines are different lengths. These examples illustrate the sort of differences in the propositional states Huemer is drawing between *seemings* and *believings*.

It is also important to distinguish Huemer's notion of *seemings* from dispositions or inclinations to form beliefs. For example, when one knows that he is observing the Müller-Lyer illusion, the subject may experience the state of seeming that the lines are of unequal lengths, but he may have no inclination whatsoever to believe the lines are of unequal length. Another reason for distinguishing seemings from dispositions to form beliefs is that seemings can be used as a way to explain many of our dispositions to form beliefs. For instance, a subject may be disposed to form the belief that she is reading an article on epistemology, but this can be explained by its seeming to her that she is reading an article on epistemology. But this explanation is more informative than the trivial statement, *she is disposed to form the belief that she is reading an article on epistemology because she is disposed to form the belief that she is reading an article on epistemology*.

Finally, seemings can be distinguished from dispositions to form beliefs because there are cases where subjects have a disposition to form a belief but not on the basis of it seeming to be the case. Huemer suggests this is the case in self-deception and wishful thinking.<sup>2</sup> For instance, after months of incompetent job performance an employee may come to believe that the reason he is being called into his employer’s office is to receive a promotion, and he forms the belief because he cannot cope with the thought of losing his job. In this case, the employee does not have one of Huemer’s *seemings* (the belief does not seem true to the person who has it), but rather, he is in the grips of wishful thinking.

With this basic understanding of what Huemer has in mind by *seemings*, we can look more closely at his principle of phenomenal conservatism. The following principle of phenomenal conservatism, according to Huemer, can “account for all foundational beliefs.”<sup>3</sup>

PC     If it seems to *S* that *p*, then, in the absence of defeaters, *S* thereby has at least some degree of justification for believing that *p*.<sup>4</sup>

In order to see what some have found plausible about PC, notice that PC only implies that *seeming*-states modestly confer “at least some degree of justification.” The principle, therefore, grounds basic beliefs defeasibly. PC is a principle that states that we have some justification for thinking things are the way they appear to be unless there is a defeater for thinking so. This is similar to the way that the presumption of innocence works in legal contexts, where defendants are presumed innocent until shown to be

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<sup>2</sup> For more on Huemer’s account of self-deception and wishful thinking, see Huemer (2001), pp. 109-111; Huemer (2007), p. 31.

<sup>3</sup> Huemer (2001), p. 99.

<sup>4</sup> This statement of PC follows Huemer (2007), which has made explicit the qualification “at least some degree of justification” which was tacitly implied in Huemer (2001), p. 99.

guilty.<sup>5</sup> The burden of proof is on the prosecution to sway the jury to believe that the defendant is guilty. If the prosecution fails to convince the jury that the defendant is guilty, then the defendant should be presumed innocent even if the lawyer representing the defendant has not demonstrated that his client is innocent. Likewise with beliefs that satisfy PC—they should be presumed to be justified until shown otherwise.

Some have argued that PC is a far too permissive principle for foundational justification.<sup>6</sup> However, those who are inclined to accept PC may insist that one of the benefits of PC is that it provides foundational justification for a variety of important beliefs that seem difficult, if not impossible, to justify without it, such as beliefs formed on the basis of memory, intuition, and testimony. While I do not intend to assess in this essay whether PC succeeds as a principle for justifying these sorts of beliefs, it is worthwhile to note that PC, if it is correct, can be a very useful principle of justification. Additionally, there is a powerful transcendental argument Huemer has proposed to justify PC that attempts to show that those who reject PC are in a self-defeating position. Presently, the question I am concerned with answering is whether the argument from self-defeat for PC is sound.

## **2. The Self-Defeat Argument for PC**

One of the most philosophically interesting claims that Huemer makes with respect to PC is that without it there can be no justified beliefs. Huemer argues that the justification of any belief depends on PC (including beliefs that purport to show PC is false), and therefore PC cannot be rejected without falling into self-defeat. So, given that any alternative position results in self-defeat, PC must be accepted. Here is Huemer’s

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<sup>5</sup> This analogy is given in Huemer (2001), p. 100.

<sup>6</sup> Such as Steup (2004), Markie (2005), and Fumerton (2008).

statement of the self-defeat argument for PC from his book, *Skepticism and the Veil of Perception*:

I think the principle of phenomenal conservatism underlies *judgement* in general. I think reflection will reveal that all judgement, whether inferential or not, is a process in which one accepts a proposition on the basis of how things seems to oneself. If phenomenal conservatism is false, so that the way things seems to oneself is irrelevant to epistemic justification, then all judgement must be irrational. And this is something which no philosopher, not even a skeptic, can accept.<sup>7</sup>

In his article, “Compassionate Phenomenal Conservatism,” Huemer lays out the self-defeat argument for PC more carefully. Huemer explains and supports the premises of the argument after giving this rough account of the self-defeat argument:

...the rejection of Phenomenal Conservatism is self-defeating, roughly, because one who rejected Phenomenal Conservatism would inevitably do so on the basis of how things seemed to himself; he would do so because Phenomenal Conservatism did not seem to him to be correct, or because it seemed to him to be incompatible with other things that seemed correct. Therefore, if this opponent of Phenomenal Conservatism were right, his belief in the negation of Phenomenal Conservatism would itself be unjustified.<sup>8</sup>

The premises that Huemer identifies as constituting the self-defeat argument are the following:<sup>9</sup>

- (1) When we form beliefs (with a few exceptions that are not relevant to this argument) our beliefs are based on the way things seem to us.
- (2) If one’s belief that *p* is based on something that does not constitute a source of justification for believing that *p*, then one’s belief that *p* is unjustified.

Therefore,

- (3) No belief is justified, unless one may have justification for believing that *p* in virtue of its appearing to one that *p*.

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<sup>7</sup> Huemer (2001), pp.107-8.

<sup>8</sup> Huemer (2007), p. 39.

<sup>9</sup> Huemer (2007), pp. 39-41.

As Huemer notes, the argument “is not directly an argument that Phenomenal Conservatism is true, but rather that epistemological theories that oppose Phenomenal Conservatism are self-defeating.”<sup>10</sup> Before showing the problems in the self-defeat argument, I’ll briefly describe the supporting reasons that Huemer gives for his premises and how Huemer intends the conclusion to support the claim that any account that rejects PC is self-defeating.

Premise (1), Huemer informs us, is an empirical claim. In normal contexts,<sup>11</sup> the way things *appear* or *seem* to us is the only relevant cause in belief-formation, or so the claim goes. Huemer tries to support this claim with two arguments. First, he argues that whenever one points to some other basis for belief-formation, these belief-forming bases are only plausible insofar as they cause us to have a *seeming*. For example, Huemer suggests that instead of taking the way things seem to be the relevant basis in forming the belief that *p*, one might hold that the basis of the belief that *p* is the fact that *p*. If the relevant basis for the belief that *p* is the fact that *p*, then it should be the case that when the fact that *p* obtains—and there is no seeming or appearance that *p*—the person should nonetheless still believe that *p*. Yet, the contrary seems to be true. Therefore, in normal contexts, the way things seem to us is the only relevant cause in belief-formation.

Second, he argues that when a person experiences that *p* seems to be the case, then the person will form the belief that *p* even when the appearance is not caused by the fact that *p* (such as in cases of hallucination or illusion). Since the same line of argument could be employed against any other plausible account of the basing relation, Huemer concludes

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<sup>10</sup> Huemer (2007), p. 41.

<sup>11</sup> Normal contexts are those that do not involve self-deception, wishful thinking, or leaps of faith. See the qualification given in Huemer (2007), p. 39, and Huemer’s discussion of the basing relation in Huemer (2001), pp. 55-57. See also Huemer’s account of self-deception and wishful thinking (references given in note 3 of this article).

that premise (1) is correct—when we typically form beliefs, they are formed on the basis of the way things seem or appear to us.

The second premise concerns a conceptual point about the requirement of proper basing in order for one to have a justified belief. The notion of “one’s having a justified belief that *p*” can be contrasted with “one’s having justification for the belief that *p*.”<sup>12</sup> The former concept requires the person to base the belief on the appropriate justification, whereas the latter does not. This can be illustrated with an example where a chemistry student is testing a liquid with litmus paper to tell whether it is acidic. Suppose that the litmus paper turns red and the chemistry student knows that this is an indicator that the liquid is acidic. Nonetheless, due to the student’s anxiety about performing the test correctly, he doesn’t believe that the liquid is acidic. Instead, the student pulls out his magic eight ball—a gag toy that reveals random answers to yes/no questions—and he asks it whether the liquid is acidic. Lo and behold, the magic eight ball gives the answer, “all signs point to yes,” and with that added comfort the chemistry student comes to believe the liquid is acidic. The student may be said to have justification for the belief that the liquid is acidic because the student has competently performed the litmus test and derived the right results. However, the student does not have a justified belief that the liquid is acidic because the student has infelicitously based his belief on the magic eight ball’s confirmation.

In the second premise, Huemer is claiming that in order for a person to have a justified belief, it is necessary for it to be based in the appropriate way. Even when a

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<sup>12</sup> This same distinction is sometimes made with the concepts of *doxastic justification* (for “one’s having a justified belief that *p*”) and *propositional justification* (for “one’s having justification for believing that *p*”). See, for example, Fumerton (1995), pp. 91-92; Pollock and Cruz (1999), pp. 79-80; Conee and Feldman (2004), pp. 201-208; Bergmann (2007), p. 6.

person may have strong justification for the belief that  $p$  (such as believing the liquid is acidic with the evidence of the litmus test), the person may still be unjustified in having the belief that  $p$  because it is not based in the right way (such as when the belief that the liquid is acidic is based on the answer of a magic eight ball).

The conclusion—that no belief is justified, unless one may have justification for believing that  $p$  in virtue of its appearing to one that  $p$ —is supposed to show that any principle of justification that is contrary to PC is self-defeating. Since premise (1) states that it is a matter of fact that we typically base all of our beliefs on seemings or appearances, any belief that PC is false will involve it seeming or appearing to that person that PC is false and the alternative account is true. From (2), it follows that unless beliefs are appropriately based, the person is unjustified in having the belief. So, the conclusion of the argument implies that those who reject PC do so unjustifiedly.

### **3. Problems with the Self-Defeat Argument**

The self-defeat argument is clever and it certainly merits philosophical investigation. Despite its ingenuity, I will show that it does not successfully establish that rejecting PC results in self-defeat. My criticism of the self-defeat argument consists of two claims. The first aims to show that the first premise is false. Seemings are not, in fact, the only plausible basis for belief formation. The second, and more contentious, claim I will make against the self-defeat argument is that PC is not an appropriate basis for justified beliefs. The first claim is less committal and therefore the stronger criticism, whereas the second claim is more ambitious and provides a more substantive and controversial assessment of PC. Since the criticisms are independent of one another, only one of them needs to succeed to undermine the self-defeat argument for PC.

### *3.1 Premise 1 is False – PC is not the only Legitimate Basis for Belief Formation*

The first problem I propose for Huemer’s self-defeat argument is in the first premise. Huemer claims that premise (1) is true for two reasons: (a) for any putative belief formed in normal contexts, seemings are the best candidate for basing from our experience; and (b) for any other putative basing relation, when it is pitted against seemings, the seeming-basis “overpowers” any putative alternative.<sup>13</sup>

One complaint that can be raised against Huemer’s first argument for premise (1) is that it neglects externalist accounts of justification where typically some features of what justifies a belief lie outside the access or awareness of the subject whose belief is justified. If externalist accounts of justification are correct, then one would expect that the first-person perspective is not going to provide a suitable position to see what factors are relevant to basing one’s belief.<sup>14</sup> Of course, Huemer is an internalist and finds externalism inadequate to respond to important epistemic problems, like the problem of skepticism.<sup>15</sup> Perhaps, we should conclude, then, that Huemer’s self-defeat argument is not intended to apply to externalist accounts of justification, or that it presumes to have ruled out externalism on other grounds. Let’s grant this. Even on internalist grounds, I believe that premise (1) can be rejected.

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<sup>13</sup> Both of these arguments for premise one are discussed in more detail in my summary of Huemer’s defense of premise in section 2 above. For this reason, I have kept the present account of them abbreviated.

<sup>14</sup> A referee for this journal has reminded me that externalists may not get off so easily. They too must have some account of the basing requirement. For example, some externalists may be happy to co-opt Huemer’s seemings as the salient belief-forming input that meets the basing requirement. While this move is available to some externalists, it is also important to remember that other externalists are at liberty to brush aside any basing relation that requires something available from the subject’s perspective.

<sup>15</sup> Huemer (2001), pp. 20-22, 104, 113, 178.

At least since Bertrand Russell, a number of internalists have argued that direct acquaintance is the appropriate basis for forming empirical beliefs.<sup>16</sup> On this front, I will argue, first, that direct acquaintance is a possible way to base beliefs without PC, and second I will claim that direct acquaintance is a plausible way to account for the basing of empirical beliefs in an internalist way.

My first point is that direct acquaintance could possibly be an appropriate basis for internally justifying empirical beliefs. To make this point, I will begin with a hypothetical case, which has no immediate bearing on Huemer’s empirical claim, but the relevant claim will follow subsequently. While cases of being directly acquainted with the truth-makers for a belief may be necessarily conjoined with the appearance of those beliefs for humans as a result of the contingent features of our biology or psychology (such as one’s awareness that one is in pain through introspection), it is not impossible to imagine intelligent creatures that due to odd mutations in their evolutionary ancestry (or some other reason) have either: (i) no seemings (in Huemer’s sense) but still have direct acquaintance with some of their pains; or (ii) who have seemings and direct acquaintance with some of their pains, but where the two have no nomological correlation with one another. Huemer would have us believe that creatures in circumstances like (i) are not justified in having any beliefs (since they have no appearances or seemings). But this is strongly counterintuitive. Even without any seeming that it is in pain, a creature in (i) who is directly acquainted its pain, the belief it’s in pain, and the correspondence that holds between its belief and pain, would have a solid internalist basis for forming that belief.

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<sup>16</sup> Russell (1912), especially chapter 5. Some examples of others who have appropriated direct acquaintance include: Lewis (1929); Price (1950); Fumerton (1995); Fales (1996); BonJour (2003).

As for creatures in circumstances such as (ii), Huemer would judge them to be justified in having those beliefs that were based on their appearances even though there would be no nomological covariation that held between their appearances that  $p$  and the fact that  $p$ . In fact, if one of these creatures were to base its belief of being in pain on direct acquaintance, but if there are no seemings that accompany the acquaintance, Huemer would have us think that these creatures do not have a justified belief. In his own words,

My claim is that when one believes without inference that  $p$ , one believes  $p$  because it appears that  $p$ , rather than because one is acquainted with the fact that  $p$ . This is supported by the fact that if things appeared to one exactly the same in the relevant respects (that is, with respect to  $p$  and propositions that bear on  $p$ ), but one was not actually acquainted with the fact that  $p$ , then one would believe that  $p$ ; and if one were acquainted with the fact that  $p$  but (perhaps *per impossibile*) it did not appear to one that  $p$ , then one would not believe that  $p$ .<sup>17</sup>

Furthermore, if one of these creatures is directly acquainted with one of its pains and how this pain corresponds to its beliefs that it is in pain (and it has no seemings for this belief), but rather it is in a state of seeming that it is not in pain, then, Huemer's position commits him to saying that this creature has some degree of justification for believing that it is not in pain. Unlike the cases of hallucination and illusion where the seeming state seems to trump other belief-forming bases, I find in this situation that direct acquaintance shows a possible way to trump seemings as the relevant basis for belief-formation. When the creature believes it is in pain on the basis of direct acquaintance and simultaneously seems not to be in pain, I see no reason to think that the creature would not believe that it is in pain and justifiably so. At least, the possibility of this result cannot be shown logically contradictory. So, the thought experiments concerning creatures in circumstances (i) and (ii) show it is possible to be justified in having an

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<sup>17</sup> Huemer (2007), p. 45.

empirical belief without doing so on the basis of seemings. Additionally, creatures in scenario (ii) show that direct acquaintance can be motivated as a dominant basing relation when pitted against seemings.

Huemer may respond to these thought experiments by noting that premise (1) was justified as an empirical thesis, not a conceptual one. In other words, what matters for Huemer’s argument isn’t how creatures could possibly base their beliefs, but on what humans actually base their beliefs.<sup>18</sup> After seeing that it is possible for direct acquaintance to base empirical beliefs adequately, however, it is easier to show that direct acquaintance may actually be the basis for some of our empirical beliefs. Consider a typical case when a human being is in pain and believes so justifiably. Not only is it possible, but it could very well be actual that in such circumstances the belief is justified on the basis of direct acquaintance. Human psychology may be constituted such that whenever a person is justified on the basis of direct acquaintance that *p*, the person necessarily has a seeming state that *p*. So, the first-person observation that seemings accompany all beliefs (of humans) justified on the basis of direct acquaintance offers a plausible way to account for some of the empirical support to which Huemer appeals without accepting his conclusion.

At this point, some may think this objection amounts to a clash of intuition. Huemer and the direct acquaintance epistemologist simply have different intuitions about the basing relation, but this only shows that each side begs the question against the other. To the contrary, the direct acquaintance alternative should be seen as a stronger alternative for two reasons. First, the direct acquaintance thesis is not a universal claim;

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<sup>18</sup> However, Huemer does claim that PC is necessarily true, and not merely a contingent truth about justified beliefs in our world. See Huemer (2001), p. 103.

for the criticism to succeed it only needs to be the case that some people have a justified belief on the basis of direct acquaintance, whereas the phenomenal conservativist is committed to the claim that all people have all their justified beliefs on the basis of seemings. Second, direct acquaintance provides stronger internalist grounds for accepting a belief to be true (or likely to be true). For example, when one is directly acquainted with one's belief that  $p$ , the fact that  $p$ , and the correspondence that holds between the belief and the fact, then one is directly acquainted with the truth-bearer (the belief that  $p$ ), the truth-maker (the fact that  $p$ ), and the correspondence that holds between the truth-bearer and the truth-maker. With these three acquaintances, the person has everything one needs to know a truth. On the face of it, then, direct acquaintance provides more from the subject's perspective to see that a belief is true (or likely to be true), and therefore it is preferable from the subject's perspective as the basis for having a justified belief.

So, the first premise of Huemer's self-defeat argument is false. Externalists will immediately reject it. Furthermore, even internalists can accept that some justified beliefs are not held on the basis of seemings by considering the strength of holding justified beliefs on the basis of direct acquaintance.

### *3.2 PC is not a Legitimate Basis for Holding Internally Justified Beliefs*

The second problem with Huemer's self-defeat argument is that it presumes that PC is a well-motivated account of internalist justification, when it is not. Huemer clearly believes that seemings or appearances are good grounds for justifying beliefs in an internalist way. In fact, Huemer regards externalist accounts of justification to be inadequate responses to important epistemic problems, which implies that his account

does not suffer from the same detractions.<sup>19</sup> In this section, I will argue that PC is not appropriately motivated as an internalist account of justification. If PC is not a well-motivated basis for having internally justified beliefs, then we have another reason to avoid the self-defeat argument for PC.

Huemer contends that PC does make sense as an internalist account of justification, where the idea is that from the first-person perspective the subject sees that endorsing PC would appear to satisfy one’s epistemic goals. He makes this case when he writes,

if my goal is to have true beliefs and avoid having false ones, and if *P* seems to me to be true, while I have no evidence against *P*, then **from my own point of view**, it would make sense to accept *P*. Obviously, believing *P* in this situation will appear to satisfy my epistemic goals of believing truths and avoiding error better than either denying *p* or suspending judgement.<sup>20</sup>

This is not right. If for no other reason, consider a paradigmatic criticism of externalism—which happens to be the same sort of reason Huemer gives for not being an externalist—that criticizes externalism for permitting beliefs to be justified when from the subject’s perspective there is no reason to suppose the beliefs are true. Perhaps the best known example is Laurence BonJour’s well-known thought-experiment of Norman the clairvoyant:

Norman, under certain conditions which usually obtain, is a completely reliable clairvoyant with respect to certain kinds of subject matter. He possesses no evidence or reasons of any kind for or against the general possibility of such a cognitive power or for or against the thesis that he possesses it. One day Norman comes to believe that the President is in New York City, though he has no evidence either for or against this belief. In fact, the belief is true and results from his clairvoyant power under circumstances in which it is completely reliable.<sup>21</sup>

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<sup>19</sup> Huemer (2001), pp. 20-22, 104, 113, 178.

<sup>20</sup> Huemer (2001), p. 104. Emphasis added.

<sup>21</sup> BonJour (1985), p. 41.

BonJour spells out the problem with Norman: “From his [Norman’s] perspective, it *is* an accident that the belief is true. And the suggestion here is that the rationality or justifiability of Norman’s belief should be judged from Norman’s own perspective rather than from one which is unavailable to him.”<sup>22</sup>

Another well-known thought experiment that pushes the subject’s perspective objection against externalism is Keith Lehrer’s example of Mr. Truetemp.<sup>23</sup> Lehrer supposes that a small device, a “tempucomp,” can be inserted in someone’s head such that it immediately causes that person to believe truly and infallibly the current temperature of one’s environment. Then, Lehrer asks us to imagine a person, Mr. Truetemp, who has had the tempucomp installed but who also has no idea that this device has been added to his body. Even though Mr. Truetemp is reliably forming true beliefs about the temperature, very few people would deem his beliefs about the temperature to be knowledge because Mr. Truetemp is clueless as to how he is acquiring his beliefs about the temperature. Reflecting on his example, Lehrer explains, “The fundamental difficulty remains, however—more than the possession of the correct information is required for knowledge. One must have some way of knowing that information is correct.”<sup>24</sup> Lehrer’s main point, then, is that the salient feature that is lacking in Mr. Truetemp’s beliefs about the temperature is that Mr. Truetemp’s sees nothing from his perspective that would make it reasonable for him to take his beliefs about the temperature to be true.

The point behind the well-known thought experiments of BonJour’s clairvoyant and Lehrer’s Mr. Truetemp is that *from the subject’s perspective* the reliably-formed

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<sup>22</sup> BonJour (1985), pp. 43-44.

<sup>23</sup> Lehrer (2000), pp. 187-88.

<sup>24</sup> Lehrer (2000), p. 188.

beliefs have no connection to truth or truth-likeness. For Norman and Mr. Truetemp the beliefs produced from their reliable belief forming faculties appear to be random and arbitrary. Now for those internalists that have been convinced that externalism suffers from the problem of satisfying the subject’s perspective on the basis of these sorts of examples, they should equally be convinced that Huemer’s PC is no better. After all, if we add to Norman and Mr. Truetemp that they find themselves with beliefs that *seem to them* to be true (while keeping everything else the same), then it is hard to see how their epistemic situation has improved. Surely any internalist who is unmoved by the reliability of Norman and Mr. Truetemp’s belief-forming processes will feel no tug to think that Norman and Mr. Truetemp are better off by having seeming-states added to their cognitive processes. Of course, advocates of PC will likely insist that by changing the thought experiments to include that Norman and Mr. Truetemp now have seeming-states that accompany their beliefs, then, they now have some degree of justification for their beliefs formed by clairvoyance or the tempucomp, even if these beliefs will ultimately be judged to be overall unjustified. But it is precisely this move that I suggest is incompatible with internalism, and which no internalist should find more plausible than the original thought experiments. Adding seeming-states to these examples does nothing to allay the obvious arbitrariness that originally convinced many that these cases lack an appropriate fit with the subject’s perspective to justify their beliefs in the internalist sense.

This point can be made sharper by specifying why seemings by themselves should not constitute internalist justification for a belief. Stated in a fast and loose way, we might say that internalists typically require justification to be manifest in evidential

relations that hold between beliefs and their justifiers that can be seen from the subject’s perspective.<sup>25</sup> Despite Huemer’s claim that PC is a necessary truth,<sup>26</sup> there is no necessary evidential connection available from the subject’s perspective that holds between justified beliefs and their seemings. The lure in accepting that the appearance that  $p$  is an appropriate basis for an internally justified belief that  $p$  is probably because (in the cases we think it applies to the contingent features of human biology or psychology) from our perspective there is an evidential connection that holds between the appearance that  $p$  and the fact that  $p$ . It is important to recognize that internalists should be quick to abandon that the appearance that  $p$  is a justifier when they think the connection between the appearance that  $p$  and the fact  $p$  is accidental (or non-existent) from the subject’s perspective (such as in the modified cases of Norman, Mr. Truetemp, or creatures with psychology like (ii) described above). If internalists of the direct acquaintance variety are correct and some instances of seemings accompany beliefs based on direct acquaintance, then in cases where humans are directly acquainted with the truth-bearer, truth-maker, and correspondence relation between the truth-bearer and truth-maker for a belief, then there is a non-accidental connection between one’s seeming to be in pain and the fact that one is in pain. To say that a person can be internally justified in believing that not- $p$  when she has grounds for believing  $p$  on the basis of direct acquaintance is no better than saying that BonJour’s clairvoyant or Lehrer’s Mr.

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<sup>25</sup> For an account of the kind of connection to truth that I have in mind for internalists, see McGrew and McGrew (2007), ch. 2.

<sup>26</sup> Huemer (2001), p. 103.

Truetemp are internally justified.<sup>27</sup> The conclusion many internalists will draw is that seemings by themselves are not a proper way to base beliefs.

So, a second problem with Huemer’s argument for PC is that it would saddle the internalist with a basing requirement that would permit slightly modified paradigm cases of external justification (like BonJour’s clairvoyant and Lehrer’s Mr. Truetemp) to have some degree of internal justification. To many internalists, Huemer’s PC will only be a distinction without a difference when compared to these externalist cases. Since Huemer’s self-defeat argument for PC works only on the presumption of internalism, and there are general reasons for thinking that internalists will find PC unmotivated on the same grounds that externalist accounts of justification are often judged to be unmotivated, it follows that Huemer’s argument relies on an unmotivated premise. Therefore, the relevant claim needed to support Huemer’s self-refutation argument will strike many internalists as unpersuasive.

In summary, I believe most will disagree with Huemer and reject his premise (1) and internalists will reject his claim that appearances in and of themselves are good grounds for justifying beliefs. To reiterate, if appearances were good grounds for justifying beliefs, then slightly modified paradigmatic cases of external justification would turn out to be good cases of internal justification. Furthermore, when the appearance that *p* and the fact that *p* have no evidential connection from the subject’s perspective, then internalists should abandon Huemer’s view. In short, the problem with Huemer’s self-defeat argument for PC is that it presumes certain claims about the justification and basing of beliefs that are false.

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<sup>27</sup> Actually, it would be worse since the beliefs held by BonJour’s clairvoyant and Lehrer’s Mr. Truetemp would infallibly be true, whereas people in this circumstance would not necessarily have a true belief by following their seemings.

#### 4. Back with a Vengeance?

I can imagine a defender of the self-defeat argument for PC waiting patiently for the exposition of what’s gone wrong with the argument to finish so that he can ask the following question: *do you believe that your criticism of the argument is true because it seems that way to you or not?* No matter how one rejects the self-defeat argument for PC, we can count on its defender having a rejoinder of this sort ready. Like the antagonists in a bad zombie movie, the self-defeat argument can always come back with a vengeance ready for another fight.

From my previous comments on the self-defeat argument, I think it is clear how to respond to this inevitable follow-up. Yes, the self-defeat argument seems to be false by my lights—but this is no reason to think that the justification or even the basis for my belief is this seeming-state. As a contingent feature of the way human biology or psychology is constituted, it could be the case that seemings accompany psychological states with sufficiently strong evidential connections that hold between beliefs and their evidence. Without further argument, however, it would be too hasty to infer from this that seemings are doing any epistemically relevant work. Indeed, if there is a nomological connection between seemings and beliefs formed on the basis of direct acquaintance, the evidence for PC derived from the counterfactual, *if it didn’t seem to me that I was in pain, I wouldn’t believe it*, is misleading since the relevant common basis for both the seeming and the belief might very well be my direct acquaintance with the pain. The right thing for the internalist to conclude, rather, is that the evidential connection from the subject’s perspective is the common cause for both the epistemic agent’s

justified belief and the parallel appearance state. There is no need to invoke seemings to avoid a self-defeating response to PC.<sup>28</sup>

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