

## Perception and evidence

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Perception is a source of knowledge: by looking at a white cup on a desk, one can come to know that there is a white cup on a desk. Schellenberg's character Percy is in such an agreeable situation, the "good case". Her hapless Hallie, on the other hand, is in the "bad case": she is hallucinating a white cup on a desk. (For maximum contrast we may take Hallie to be a lifelong victim of hallucination, waiving the usual externalist worries about whether this is genuinely possible.) We may suppose that Percy and Hallie share a very specific visual state that completely characterizes the character of Hallie's hallucinatory experience. We can think of Percy's total visual state as entailing this specific visual state that he and Hallie share, as well as entailing the state of seeing a white cup, a state that Hallie of course is not in. Because of the shared state, Percy's total visual state is indiscriminable from Hallie's, in the following sense: a ordinary perceiver who starts off in one state and then at time  $t$  enters the other state would be unable—absent collateral information—to tell that a change of state had occurred at  $t$ . Although their states are indiscriminable, Hallie's epistemic situation is significantly worse than Percy's. Percy knows that there is a white cup on a desk; Hallie doesn't. She does, like Percy, believe that there is a white cup on a desk, but this belief is false.

Is Hallie's epistemic position with respect to the proposition that there is a white cup on a desk completely hopeless? Perhaps not, because there are epistemic goods that fall short of knowledge: despite not knowing that there is a white cup on a desk Hallie might have *evidence* for her belief, or her belief might be *justified*.

Although Schellenberg occasionally mentions justification, she prefers to talk of evidence. According to her, "perceptual experiences", or "sensory states", "provide us with evidence" (Schellenberg forthcoming a, p. 2). At least part of the evidence that they provide is what Schellenberg calls "phenomenal evidence"

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(12). Percy and Hallie, she thinks, have the same phenomenal evidence.<sup>1</sup> In particular, Hallie has phenomenal evidence for the proposition that there is a white cup on a desk—evidence that is, of course, misleading.

Part of the interest and novelty of Schellenberg's view is that she thinks that Percy has a kind of evidence that Hallie lacks: as Schellenberg explains in a companion paper, he has "additional factive evidence" (Schellenberg forthcoming b, p. 1). Her project is to find a middle way between the traditional view, on which Hallie and Percy have the same foundational mental evidence, and the view on which hallucinating does not guarantee that Hallie has any evidence at all. More on that later. Let us first examine Schellenberg's positive claim about Hallie.

## 1 Evidence and justification

How plausible is it that Hallie has evidence for the proposition that there is a white cup on a desk? (Since we may assume that Hallie makes use of any evidence she has, Hallie has evidence for the proposition that there is a white cup on a desk iff her belief that there is a white cup on a desk is based on evidence for this proposition.<sup>2</sup>) As Austin noted, talk of evidence in a paradigmatic case of perceptual knowledge is odd:

The situation in which I would properly be said to have *evidence* for the statement that some animal is a pig is that, for example, in which the beast itself is not actually on view, but I can see plenty of pig-like marks on the ground outside its retreat. If I find a few buckets of pig-food, that's a bit more evidence, and the noises and the smell may provide better evidence still. But if the animal then emerges and stands there plainly in view, there is no longer any question of collecting evidence; its coming into view doesn't provide me with more *evidence* that it's a pig, I can now just *see* that it is, the question is settled. (1962, p. 115)

Admittedly Austin has slightly over-egged his pudding. Even when face-to-face with the pig I might be said to have evidence that it is a pig. It is, suppose, grunting, pink, pig-shaped, and curly-tailed. I can see the animal's color and shape and hear its sound, and surely this is evidence that it's a pig. These are the items I would naturally cite if asked 'Why think that's a pig?' Still, it is not obvious that this evidence is, in fact, the evidence (or part of it) on which I based my belief that the animal is a pig. Perhaps that belief is produced by a sub-personal object-recognition process which does not rely on anything which could reasonably be called 'my evidence'. (Introspection, well-known

<sup>1</sup> Schellenberg's remark that "[a] subjectively indistinguishable perception will provide us with the very same phenomenal evidence" (12) suggests that if *S* and *S'* are subjectively indistinguishable (or indiscriminable) sensory states then *S* and *S'* provide the same phenomenal evidence. There is a familiar problem with this suggestion, given that subjective indistinguishability is non-transitive and sameness in such-and-such respect is transitive. Schellenberg should not be taken to endorse the suggestion, since she clearly rejects it elsewhere (forthcoming b, p. 27).

<sup>2</sup> 'Based on' is to be understood in the everyday sense in which, for example, Poirot's belief/knowledge that Inglethorp is the murderer is based on evidence; no controversial account of "the basing relation" is being assumed.

to be an unreliable guide to the mental processes that underlie beliefs, is unlikely to settle the matter.) And in any case, are my beliefs about the animal's shape or sound based on evidence? A philosopher might claim that they are based on evidence about "appearances", but that is not something that can be read off the way we ordinarily talk about evidence. *Prima facie*, many of the things we know by perception are not known on the basis of evidence.

This point can be reinforced by consideration of what evidence is. Although it is perfectly proper to call a "bucket of pig food" evidence, it is more theoretically perspicuous (as argued in Williamson 2000, ch. 9) to take evidence to consist of facts, for instance the fact that there is a bucket of pig food at the door of a ramshackle shed. For one thing, this fits much better with an "inference to the best explanation", where we consider which hypotheses would, if true, best explain our evidence. This suggests that evidence is *factive*, since only facts can be explained.<sup>3</sup>

If evidence consists of facts, what is it to "have" some evidence? There is plenty of evidence that there is a pig in the vicinity: there is a bucket of pig food outside the door, a pig-like odor in the air, and so forth. But this won't help Austin discover the presence of a pig, unless this evidence is in his possession. Plausibly Austin needs, at a minimum, to *believe* that there is a bucket of pig food outside the door for this fact to be part of his evidence. If he didn't believe it, he is not in position to reason from his evidence, and one's evidence is at least something one is in a position to reason from. (According to Williamson's "E = K" thesis, one's evidence comprises all and only the facts one knows, but the weaker claim will suffice for the moment.<sup>4</sup> Williamson's view will reappear in Sect. 4.)

Return to Schellenberg's claim that hallucinating Hallie has evidence for the proposition that there is a white cup on a desk. If evidence consists of facts, what is that evidence? Since there are no relevant facts about colored and cup-shaped objects, the evidence must be a fact about her experience—that she seems to see a white cup on a desk, or something along those lines. Having phenomenal evidence thus requires sophisticated beliefs about one's perceptual states. If Hallie is an hallucinating hedgehog, presumably lacking the required self-knowledge, she has no phenomenal evidence. Schellenberg flatly rejects this view of phenomenal evidence: "The notion of phenomenal evidence that I have developed makes room for experience providing us with phenomenal evidence directly even in the bad case without retreating to introspective evidence" (forthcoming a, p. 13; see also forthcoming b, pp. 3–4). On Schellenberg's view, then, lack of self-knowledge is no barrier to having phenomenal evidence.

<sup>3</sup> More carefully, any non-factive explanandum (e.g. the subprime mortgage crisis) has a (contextually salient) factive counterpart, for instance the fact that the subprime mortgage crisis occurred; to explain the non-factive explanandum (in the context) is to explain the contextually salient factive counterpart. Cf. Williamson (2000), pp. 194–195 (Williamson is here arguing for the weaker claim that evidence is propositional, not that it is factive).

<sup>4</sup> There is plenty of resistance to E = K, although less engagement with Williamson's straightforward argument for it (2000, pp. 193–207). Another (quick) consideration in favor is this: evidence is the kind of thing that it is permissible to share. If P is part of my evidence, then in the course of collective inquiry it is permissible for me to share this piece of evidence by asserting it. But it is only permissible to assert P if one knows P (ch. 11).

Schellenberg's so-called phenomenal evidence does not fit the most natural conception of what evidence is, and what possessing evidence amounts to. Without additional argument, its existence looks shaky. It might be objected that this is a merely terminological issue: Schellenberg's central claim is, or ought to be, that Hallie's belief that there is a white cup on the desk is *justified*. Perhaps it is unhappy to put this using 'evidence'; if so, we can avoid the term altogether.

The problem with this is that 'justified belief' is largely an expression used by philosophers, as (for example) Sutton (2007, p. 153, n. 38) and Hawthorne and Stanley (2008, p. 573) point out. Talk of 'evidence' is commonplace; 'justified belief', on the other hand, is epistemological argot. Outside the specialist literature, evidence is familiar and relatively clear, justified belief unfamiliar and relatively unclear.<sup>5</sup> One might expect explanations of the latter in terms of the former, and indeed canonical examples of "justified belief" are precisely examples of beliefs based on evidence.<sup>6</sup> Consider the examples at the top of the canon, those in Gettier's "Is justified true belief knowledge?" (1963). Although the official target of that paper is the analysis of knowledge as "justified true belief", when Gettier describes his two counterexamples to the analysis justification drops out. In each case Gettier supplies the fact that, he says, is "Smith's evidence" (122) for a certain true proposition that Smith believes but does not know.

If we understand 'justified belief' via the canonical examples, it is quite doubtful that there are cases of justified belief where the belief is not based on evidence; granted that Hallie's belief is not based on evidence, her belief is not justified.<sup>7</sup>

Still, it must be admitted that many philosophers will claim that Hallie's belief that there is a white cup on a desk *is* justified, while agreeing that her belief is not based on evidence. (For these philosophers, then, the canonical examples are not the only route to understanding 'justified belief'.) One motivation for this view is the thought that Hallie is not *simply* blameless for believing that there is a white cup on a desk. In addition, she deserves some sort of positive epistemic appraisal, appraisal that would not be appropriate if she had believed instead that there was a blue pencil

<sup>5</sup> The activity of *justifying* one's beliefs (actions, decisions, salary,...) is familiar, but the literature sharply distinguishes this from having a justified belief, which is generally taken not to require the capacity to cite evidence or reasons (Alston 1985, p. 58; this paper also contains the classic exposition of the normative way of explaining 'justified belief', discussed two paragraphs below).

<sup>6</sup> The relevant sense of 'justified belief' is *doxastically* justified belief. But a similar point holds for *propositionally* justified belief, what one is justified *in* believing. Canonical examples of this are precisely examples of beliefs for which one *has* evidence. Incidentally, it is apparent from the opening of Gettier's paper that he takes the notions of being "justified in believing P" and of "having adequate evidence for P" (Chisholm's version of the justification clause in the JTB analysis of knowledge) to be at least very similar, if not actually equivalent.

<sup>7</sup> We may (harmlessly) grant that knowledge provides an exception. (This is not relevant to Hallie, since she lacks knowledge.) If knowing P entails justifiably believing P, then a case where one knows P not on the basis of evidence is a case of justified belief not based on evidence. And there is certainly some temptation to apply 'justification' to all instances of knowledge, even if the intended sense of 'justified belief' is explained by means of the canonical examples. But this is not of much significance: it may just reflect the fact that knowing is an epistemically excellent state, which strongly suggests an affirmative answer to the philosopher's less-than-perfectly-clear question 'Is the knower's belief justified?'. (One could hardly say that the knower's belief is *unjustified*.)

on a filing cabinet, keeping her experience as of a white cup on a desk fixed. How should she be appraised, exactly? These philosophers will insist that Hallie, like Percy, is fulfilling her epistemic obligations, or has an epistemically admirable belief, or something along these lines. Now one way of fulfilling one's obligations, or of having an epistemically admirable belief, is to believe on the basis of adequate evidence; granted that Hallie has no such evidence, there must be other ways. And 'justification' is an obvious term to appropriate for this important normative status that Hallie's and Percy's beliefs allegedly share; this, then, is the (stipulative) sense in which Hallie is taken to have a "justified belief" that is not based on evidence.<sup>8</sup>

But an alternative appraisal of Hallie is not hard to find. On one natural way of filling in the story, Hallie is much like Percy: they are both epistemic machines well-designed to accumulate knowledge about their surroundings, in normal terrestrial conditions. (As we'll see shortly, Schellenberg herself appeals to this sort of consideration in developing her positive proposal.) Unfortunately, Hallie is in abnormal conditions: she is like an Earthly weighing scale, or an Earthling golfer, on Mars. The Earthly scale on Mars may be complimented for its precision engineering that delivers accurate results on Earth, even though while resting on the Martian landscape it is seriously inaccurate. The scratch golfer may have an impressive swing, even though her shot goes way past the Martian green. Consistently with that, assessed by the usual standards, the scale's measurement and the golfer's shot have little to be said for them; the scale is not measuring as scales ought to measure, and the golfer is not playing as golfers ought to play.

Similarly, we may evaluate Hallie's epistemic machinery with respect to the sort of conditions for which it was designed, even though she is not actually in these conditions. And with respect to those conditions, her machinery is functioning well; if she had believed instead there was blue pencil on a filing cabinet, keeping her experience fixed, it would have been functioning poorly. But, as with the scale and the golfer, we can pay her that compliment without taking her belief that there is a white cup on a desk to have much going for it, by the usual standards. Percy may be fulfilling his epistemic obligations, and his belief may be admirable; absent further argument, the case for treating Hallie similarly has not been made.

To sum up. On what is arguably the best-motivated conception of evidence, Hallie has no evidence (or need not have any) for her belief that there is a white cup on a desk. By the same token, her belief is not justified if that notion is explained in terms of evidence. Matters are scarcely improved if 'justified belief' is given an alternative overtly normative explanation.

## 2 Schellenberg's argument for phenomenal evidence

To her credit, Schellenberg does not take her claim about Hallie to be obvious; she provides an argument for it. That argument may be set out as follows (see forthcoming a, p. 10):

<sup>8</sup> In this normative sense of 'justification', it straightforwardly applies to knowledge. Cf. note 7 above.

1. Hallie's sensory state is "systematically linked to what it is of in the good case".
2. If Hallie's sensory state is systematically linked to what it is of in the good case, then "it is epistemically rational [for Hallie] to heed the testimony" of this sensory state.
3. If it is epistemically rational [for Hallie] to heed the testimony of this sensory state, then it "provide[s] evidence".

Hence:

C. Hallie's sensory state provides evidence.

The explanation of "systematic linkage" is this:

[S]ensory states are systematically linked to what they are of in the good case in the sense that the discriminatory, selective capacities employed in the bad case are explanatorily and metaphysically parasitic on their employment in the good case. (8).

Let us grant premise 1, deferring discussion of "systematic linkage" to the following section. Schellenberg says she "will give support to [the second and third premises] in turn" (10). Taking this in reverse order, the support for the third premise is that:

[i]t follows from a substantive but largely uncontroversial view about evidence, namely, that...if it is epistemically rational to heed  $x$  in the absence of defeaters, then  $x$  provides evidence. (10–11)

The relevant  $x$  is a "sensory state", which raises a question of interpretation. What is it to "heed" a sensory state? Taken literally, it would mean *pay attention* to a sensory state, but that is clearly not what is intended. The answer is apparent in the formulation that appears in the statement of the second and third premises, which Schellenberg uses interchangeably with 'heeding a sensory state', namely 'heeding the testimony' of a sensory state. The "testimony" of a sensory state is its content, the way the state represents the perceiver's environment as being.<sup>9</sup> To heed the testimony of a sensory state is for the state to cause one (in some appropriate way) to believe, or at least to invest some confidence in, its content. Importantly, one may heed the testimony of a state even though one is not aware of being in the state; Hallie the hedgehog may thus heed the testimony of her sensory states.

Consider Percy, situated in the good case. Percy heeds his visual sensory state, which for simplicity we may take to have the content that there is a white cup on a desk. He thereby knows that there is a white cup on a desk. Whatever 'epistemically rational' means, it applies here if it applies anywhere: Percy is epistemically rational in heeding his sensory state. So if Schellenberg's "largely uncontroversial view about evidence" is correct, Percy's sensory state must provide evidence. What is that evidence? Could it be the sensory state itself, or alternatively the fact that Percy

<sup>9</sup> See Schellenberg forthcoming b, Sect. 3.1.

is in the state? By the argument of the previous section, neither choice is appealing. If it's the sensory state, then this runs up against the plausible view that evidence consists of facts. If it's the fact that Percy is in the sensory state, this runs up against the plausible view that Percy must believe his evidence. Moreover, the terminology of 'providing evidence' suggests that the evidence is something quite distinct from the sensory state. Could the evidence be, instead, the fact that there is a white cup on a desk? Plainly that is not Schellenberg's view: the evidence at issue is *phenomenal* evidence, which is supposed to be shared by both Percy and Hallie, and in Hallie's situation there is no such fact. Since there seem to be no other candidates for the evidence supplied by Percy's sensory state, this undermines the third premise.

However, the softest spot in the argument is the second premise: if Hallie's sensory state is systematically linked to what it is of in the good case, then it is epistemically rational for Hallie to heed the testimony of this sensory state. Here is the extent of Schellenberg's support for it:

If sensory states are systematically linked to what they are of in the good case in the way specified, then it is the function of sensory states to single out what they are of. It is the function of a discriminatory, selective capacity to single out, say, instances of red. This is so regardless of how often the capacity in fact singles out instances of red. So in speaking of it being the function of discriminatory, selective capacities to single out what they are of in the good case, I do not mean to speak of their actual reliability but rather of how they are to be understood metaphysically. (forthcoming a, p. 10)

Contrary to advertisement, this paragraph simply clarifies what Schellenberg means by speaking of the "function" of a sensory state. It does not supply the needed connection between systematic linkage (or the closely connected notion of function), and epistemic rationality.<sup>10</sup>

Although Schellenberg's discussion leaves the second premise hanging in the air, it may yet be plausible. The next section examines this issue.

### 3 Systematic linkage

Along with many other philosophers, Schellenberg takes the good case to be in an important sense primary, and the bad case secondary. More specifically, she thinks that Hallie is hallucinating a white cup on a desk because she is employing capacities specified in terms of their role in successful perception. As Schellenberg puts it, Hallie's sensory state is "systematically linked to what it is of in the good case":

[E]ven though she fails to single out any white cup, she is in a sensory state that is as of a white cup in virtue of employing the capacity to discriminate and

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<sup>10</sup> The corresponding paragraph in forthcoming b (16–17) is longer, but doesn't appear to support the second premise any better.

single out white from other colors and cup-shapes from other shapes.  
(forthcoming a, p. 5)

One might worry that this won't pin down Hallie's state as visual, but Schellenberg adds that Hallie is employing her capacity "in a sensory mode"; in particular, the mode of "seeing". For convenience, we can build the mode into the capacity: Hallie is thus employing the *visual* capacity to discriminate and single out white from other colors.

Schellenberg does not explicitly argue for this view, instead presenting it as an independently attractive idea, which it is. However, the significance of the proposal lies in the details, and there is some room for doubt that Schellenberg has supplied enough of them.

Percy and Hallie have the same relevant visual capacities, but only Percy is employing them successfully. Percy "singles out" a particular white cup, and "discriminates" and "singles out" white from other colors. To a first approximation, this amounts to saying that Percy sees a white cup, and that the white cup looks white to him. Hallie, we may grant, has the same capacity to see white cups, and to have white cups look white to her; absent certain interfering conditions and with a white cup present, she would be as successful as Percy.<sup>11</sup>

Hallie doesn't just possess the same capacities as Percy: she also *employs* those capacities—unsuccessfully, of course. That is what is supposed to explain why "she is in a sensory state as of a white cup". But what is it to *unsuccessfully* employ a capacity to  $\phi$ ? If one has a capacity to  $\phi$  (to see appropriately placed white cups, to tie one's shoes, etc.) then one has some sort of apparatus or mechanism that, when working properly in suitable conditions, allows one to see white cups, or to tie one's shoes. One has a normal human visual system, say, or one has hands and internalized shoe-tying motor instructions. Granted that we can make sense of the mechanism working *properly*, we can also make sense of it working improperly, of it being defective. For example, macular degeneration can destroy central vision, impeding one's capacity to see a white cup; Parkinson's disease can impede one's capacity to tie one's shoes. Further, the fault might lie in the conditions, rather than the mechanism: there's nothing wrong with one's vision, but it is too smoky to see the cup, one's manual dexterity is unimpaired but one's shoelaces are slippery with mud, and so forth.

The diversity of ways in which one can unsuccessfully employ a capacity to  $\phi$  raises a worry for Schellenberg's account of sensory states in terms of capacities. Consider a scenario in which there is a white cup before Hallie, who is not hallucinating. She does not see the cup because she is suffering from macular degeneration or, alternatively, because her office is filled with smoke. Then there is a perfectly good sense in which Hallie is (unsuccessfully) employing her capacity to see white cups, to have white cups look white to her, and the like. After all, the appropriate counterfactuals are true: if her macula had been intact, or if the smoke had been absent, she would have seen a white cup and it would have looked white

<sup>11</sup> We can just stipulate that this is true of Hallie, but it is quite unlikely to hold of hallucination in general. See, for instance, the description of Charles Bonnet syndrome in Sacks (2012, ch. 1).



(cf. 6). But Hallie is not “in a sensory state that is as of a white cup”. Evidently some restriction needs to be placed on the employment of a visual capacity if Schellenberg’s account is to work. Hallie needs to be employing her capacity to see white cups (etc.), in such a way that she is in a sensory state that is as of a white cup. So restricted, the account is circular, although it is not thereby rendered trivial. (It would be essentially equivalent to the common but non-trivial claim that hallucination is a kind of failed perception.) Schellenberg may have something reductive in mind, but if so she has not spelled out the restriction adequately.

In any case, there is a fundamental difficulty for using Schellenberg’s idea that Hallie is unsuccessfully employing her visual capacities to defend the second premise of the argument for phenomenal evidence, namely:

2. If Hallie’s sensory state is systematically linked to what it is of in the good case, then “it is epistemically rational [for Hallie] to heed the testimony” of this sensory state.

In general, one might *unsuccessfully* employ a capacity to  $\phi$  while not even *approaching* success—for all her skill, an unlucky archer might miss the target by miles. Percy successfully employs his visual capacities, and as a result comes to know that there is a white cup on a desk. Hallie unsuccessfully employs hers, but nonetheless according to Schellenberg achieves some epistemic benefit: although Hallie does not know that there is a white cup on a desk, she does acquire some evidence for this. Since this sort of consolation prize is not usually to be expected, why is Hallie’s case special?

Consider the following example. By reasoning in the following way, Harold might unsuccessfully employ his capacity for epistemically impeccable reasoning:

1. If Obama was born in Kenya, he’s not a legitimate president.
2. Obama was born in Kenya.

So: he’s not a legitimate president.

Imagine that Harold has become convinced that premise 2 is true, due to some memory confusion. His belief that Obama was born in Kenya is not supported by his evidence and is epistemically worthless. The product of epistemically impeccable reasoning is knowledge, and of course Harold hasn’t achieved that. But in (unsuccessfully) employing his capacity for such reasoning he hasn’t even come close—his belief that Obama is not a legitimate president is as worthless as his belief that Obama was born in Kenya.

So much for phenomenal evidence; let us now turn to the factive kind.

#### 4 Schellenberg’s argument for factive evidence

“Factive perceptual evidence”, Schellenberg explains, “is necessarily determined by the environment to which one is perceptually related such that the evidence is guaranteed to be an accurate guide to the environment” (forthcoming b, p. 18). She then remarks that one way of “understanding a factive conception of evidence given

this constraint” is a version of Williamson’s  $E = K$  thesis, that “factive perceptual evidence” is “the set of propositions one knows at any given moment” (forthcoming b, p. 18); let us call that thesis ‘ $FE = K$ ’.<sup>12</sup> Other ways of understanding a factive conception of evidence are said to be the view that “factive evidence is not propositional and does not amount to knowledge, and the view that it is propositionally structured without constituting knowledge” (19). Schellenberg’s argument for factive evidence is supposed to be indifferent between these three options, and Schellenberg herself does not express a preference for either one.<sup>13</sup> So for the sake of clarity and definiteness we can assume that the first option is correct:  $FE = K$  is true.

Schellenberg’s argument for “the thesis that experience provides us with factive evidence” is this:

1. If a subject  $S$  accurately perceives her environment, then  $S$  accurately represents her environment on the basis of her environment.
2. If  $S$  accurately represents her environment on the basis of her environment, then  $S$  has factive evidence determined by her environment.

Hence

- C. If  $S$  accurately perceives her environment, then  $S$  has factive evidence determined by her environment. (19, premises relabeled.)

Granted that we sometimes do accurately perceive our environment, it follows that sometimes “experience provides us with factive evidence”.

The first premise is supposed to be a consequence of a thesis that Schellenberg has argued for elsewhere (2011), namely that perception is representational. That thesis is, as Schellenberg notes, controversial (and, it might be added, in need of some clarification<sup>14</sup>). However things stand with the first premise, the second appears to be incorrect, at least under our assumption that factive evidence is knowledge.

To see this, the second premise needs to be unpacked. By saying that “ $S$  accurately represents her environment *on the basis of her environment*”, Schellenberg means to rule out cases of so-called veridical illusion and hallucination, where one’s experience is accurate but accidentally so. There might be a white cup exactly where Hallie hallucinates a white cup to be: her experience accurately represents her environment, but not “on the basis of her environment”. And by saying that “ $S$  has factive evidence”, Schellenberg means, specifically, facts

<sup>12</sup> Presumably Schellenberg does not mean that *all* one’s knowledge, no matter how distantly related to perception, counts as “factive *perceptual* evidence” (perhaps, though, it is supposed to count as factive evidence). This complication won’t matter for present purposes.

<sup>13</sup> The third option appears to be the view that evidence consists of facts, but that one need not know a fact  $P$  in order for  $P$  to be part of one’s evidence; the second option is less clear, since Schellenberg does not explain the contrast between ‘propositional’ and ‘non-propositional’: if facts are true propositions, then this distinction presumably collapses.

<sup>14</sup> For different ways of trying to clarify the thesis, see Byrne (2009) and Siegel (2010); Brewer (2011, ch. 4) argues against it.

corresponding to *S*'s "accurate representation" of her environment, which in Percy's case includes the fact that there is white cup on a desk.

In the course of defending the second premise, Schellenberg appeals to this claim: "It is fair to say that on any reasonable conception of what evidence requires we should hold that we have evidence, if we accurately represent our environment on the basis of our environment" (forthcoming b, p. 21). But, assuming  $FE = K$ , that does not appear to be correct. Consider Henry, who gets a good view of one of the few barns in fake-barn country, and thereby believes that there is a barn before him.<sup>15</sup> This is not a case of veridical illusion or hallucination: Henry sees a barn in the usual manner, and the barn looks as it is. Yet Henry does not know that there is a barn before him. Granted  $FE = K$ , the fact that there is a barn before him is not part of his evidence, which falsifies the second premise.

Why was an argument for factive perceptual evidence needed in the first place? After all, if we assume  $FE = K$  (as Schellenberg is not adverse to doing), only a skeptic would deny that we are in possession of large quantities of factive perceptual evidence. The reason is because Schellenberg wants to explain why Percy (for example) knows that there is a white cup on a desk *without appealing to Percy's phenomenal evidence*. And that is what her argument is intended to accomplish: Percy has factive perceptual evidence (i.e. knowledge that there is a white cup on a desk, given  $FE = K$ ) because he is "accurately representing his environment on the basis of his environment", which does not appear to presuppose that Percy has phenomenal evidence. Although, on Schellenberg's view, factive and phenomenal evidence have "the same rational source" (1), her picture is that the two kinds of evidence are produced by the "rational source" analogously to two effects resulting from a common cause. Put another way, Schellenberg does *not* hold the traditional view that Percy's knowledge is simply the result of his possessing (phenomenal) evidence that Hallie also possesses, and being in the right place at the right time. On that view (granting  $FE = K$ ), it is indeed true that "Hallie has some evidence, but not as much as Percy" (1), but Schellenberg is not trying to defend tradition. That is why she needs to give a particular kind of explanation of Percy's factive perceptual evidence.<sup>16</sup>

Schellenberg's repudiation of the traditional view raises a natural worry. Since she thinks that Percy has phenomenal evidence, why not leave the matter there? Can't that serve as the sole underwriter of his knowledge that there is a white cup on a desk? This is the topic of the final section.

<sup>15</sup> See Goldman (1976, pp. 772–773).

<sup>16</sup> A quick way of seeing that Schellenberg rejects the traditional view is to note her emphasis on the fact that Percy knows, not just that *a* white cup is on *a* desk, but that *this* white cup is on *that* desk. (See forthcoming b, esp. Sect. 3.2.) According to Schellenberg, Hallie has phenomenal evidence for the first proposition, but no phenomenal evidence for the second (or any similar singular proposition); since Percy has the same phenomenal evidence, he has no phenomenal evidence for the second either. Phenomenal evidence, then, is not part of the explanation of how Percy knows that this white cup is on that desk. And given this, there is an explanation of how Percy knows (or, at least, is in a position to know) that *a* white cup is on *a* desk that does not appeal to phenomenal evidence: Percy knows it by deduction from the singular premise that this white cup is on that desk.

## 5 The motivation for Schellenberg's project

Evidence can support a hypothesis to a greater or lesser degree. How strong is Hallie's phenomenal evidence for the proposition that there is a white cup on a desk? Schellenberg's arguments do not purport to settle the issue. Consider, first, the view that Hallie's phenomenal evidence is weak. It merely makes the proposition that there is a white cup on a desk more probable than it was before Hallie hallucinated: Hallie should believe that it's more likely that there is a white cup on a desk (or, alternatively, increase her credence in the proposition that there is a white cup on a desk), but she should not believe it outright. This is unlikely to satisfy those who think that Hallie (even if a non-introspective hedgehog) has some evidence (or some justification) for believing that there is a white cup on a desk. Such philosophers invariably go further: they think that Hallie should *believe* that there is a white cup on a desk, not simply regard it as a plausible conjecture, or as a hypothesis deserving of more investigation. The "motivating intuition" is that Hallie and Percy should believe alike, and of course Percy believes, as he should, that there is a white cup on a desk.

Now consider the second option, that Hallie's phenomenal evidence is strong. Like Percy, she should believe that there is a white cup on a desk—at least in some sense of 'should'. In this respect, she and Percy are like detectives who have compelling evidence that OJ is the murderer. Detective Percy is in the actual world, where OJ did the deed, and is the source of the incriminating bloodstains and so forth. Detective Hallie is in an alternative possible world, where all the evidence was planted and OJ is innocent.

This option will certainly placate those philosophers mentioned two paragraphs back. But now we already have an adequate explanation of why Percy knows that there is a white cup on a desk, which appeals to the phenomenal evidence that he and Hallie share. Why hunt for another?

This suggests that Schellenberg's grand project, although illuminating in a variety of ways, is undermotivated. There is little reason to suspect that Hallie has weak phenomenal evidence, so little reason to seek a proper argument for that conclusion. On the other hand, there is (at any rate according to many philosophers) reason to suspect that Hallie has strong phenomenal evidence. However, if that conclusion can be secured by argument there no need to pursue a belt-and-braces approach, seeking a second explanation of Percy's knowledge, and rejecting the traditional view.

And in any case, as (briefly) argued, on the proper explication of evidence, Hallie lacks it entirely; on the usual ways of explaining justification, she lacks that too. There's no injustice in awarding all the epistemic prizes to Percy.

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