

Etiology, Understanding, and Testimonial Belief

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0. Introduction.

The etiology of a perceptual belief can seemingly affect its epistemic status. There are cases in which perceptual beliefs seem to be unjustified because the perceptual experiences on which they are based are caused, in part, by wishful thinking, or irrational prior beliefs. It has been argued that this is problematic for many internalist views in the epistemology of perception, especially those which postulate immediate perceptual justification. Such views are unable to account for the impact of an experience's etiology on its justificational status (see Markie (2005, 2006, 2013), McGrath (2013), Siegel (2012, 2013), and Vahid (2014)).

Our understanding of what we have been told can also be affected by, for example, wishful thinking or irrational background beliefs. I argue that testimonial beliefs¹ based on such states of understanding can thus be rendered unjustified. This is problematic not only for internalist immediate justification views of testimony, but also for some externalist views, such as the form of proper functionalism endorsed by Burge (1993), and Graham (2010). The testimonial version of the argument from etiology, unlike the perceptual variant, does not rest on the controversial hypothesis that perception is cognitively penetrable. Furthermore, there is a stronger case for the claim that testimonial justification can be undermined by etiological effects since, I argue, testimonial beliefs can be based on the background mental states which affect our understanding of what is said, and our states of understanding are rationally assessable.

In section one I will provide a brief overview of the perceptual argument from etiology, focusing on Susanna Siegel's recent work. Siegel provides an example in which a perceptual belief is rendered unjustified due to its etiology. She then provides two separate arguments for the verdict that justification is indeed undermined in such cases. In section two I will briefly discuss the notion of linguistic understanding and the commitments of various views of testimony with respect to our epistemic right to rely on our understanding. This will serve to identify which views of testimony will be rendered untenable by the testimonial argument from etiology. In the third section I will

¹ Whether or not beliefs based on misunderstandings of testimony should really be counted as testimonial beliefs is unclear. This terminological issue will not be relevant to the argument of this paper so I will put the issue to one side.

present the testimonial version of the argument from etiology. I will illustrate two ways in which background beliefs can affect our understanding of what is said. Firstly I will consider effects on speech perception, secondly I will consider effects on meaning assignment. In section four I will argue that our testimonial beliefs can be based on the background beliefs which influence them, and that our understanding of what we have been told can be irrational. This strengthens the case for the view that the etiology of a state of linguistic understanding can undermine the justification for beliefs based on that state of linguistic understanding, even if the same does not hold of perception. I will close by considering and rejecting the claim that most views of testimony are able to avoid the problem by appeal to no defeater clauses.

1. Etiological Effects on Perception.

The etiology of a belief can affect its justificational status. Beliefs formed via wishful thinking, circular reasoning, or on the basis of irrational fears, are unjustified. Moreover, such ill-founded beliefs are able to transmit their ill-foundedness to other beliefs. Siegel (2012, 2013) argues that the etiology of a perceptual experience can remove that experience's ability to justify beliefs. Some perceptual beliefs have irrational etiologies (she labels these 'checkered beliefs'). Consider the following example:

ANGRY-LOOKING JACK: Jill believes, without justification, that Jack is angry at her. The epistemically appropriate attitude for Jill to take toward the proposition that Jack is angry at her is suspension of belief. But her attitude is epistemically inappropriate. When she sees Jack, her belief makes him look angry to her. If she didn't believe this, her experience wouldn't represent him as angry. Siegel (2012), 209.

The content of Jill's perceptual experience is caused, in part, by her unjustified belief that Jack is angry. Moreover, this manner of influence by an irrational belief seems to remove the experience's ability to justify Jill's belief about Jack's mood. Her belief that Jack is angry seems intuitively unjustified despite the fact that she experienced him as appearing angry². This manner of influence is called 'cognitive penetration'. Jill's perceptual experience is cognitively penetrated by her prior irrational belief that Jack is angry. Cognitive penetration is a type of causal influence background mental states can seemingly have on the contents of one's experiences³. Not all causal influences by

² Not everyone shares this intuition. As we will soon see, Siegel provides further argument that Jill's belief is unjustified. So her verdict does not rest purely on intuitions about cases like ANGRY-LOOKING JACK.

³ It is ultimately an empirical question whether our experiences really are cognitively penetrable in this way. This will

background states are cases of cognitive penetration. If one's fear of spiders causes one to look in the corner, and one happens to see a spider, then one's experience of the spider is caused, in part, by one's fear of spiders. This is not a case of cognitive penetration. If one's fear of spiders causes one to see a piece of wire as a spider then this is a case of cognitive penetration. Roughly, one's experience is cognitively penetrated by a mental state m if another agent possessing the same perceptual faculties attending to the same stimuli from the same perspective, but lacking m , would have a perceptual experience with a different content⁴. For example, an agent in Jill's position who did not already believe that Jack was angry would not experience him as appearing angry⁵.

Not all views of perceptual justification are able to easily accommodate the notion that an experience's justificational status can be downgraded by its etiology. For example, immediate justification views of perception hold that when it perceptually seems to us that p we are by default justified in forming a belief that p (assuming we possess no defeaters). That is, perceptual seemings themselves provide immediate (defeasible) justification. In ANGRY-LOOKING JACK it perceptually seems to Jill that Jack is angry, and she possesses no defeaters. Thus, according to immediate justification views of perception Jill is justified in believing that Jack is angry. If Jill's perceptual experience genuinely is unable to justify her belief that Jack is angry, then immediate justification views of perception must be rejected.

Rather than simply rest her argument on intuitive verdicts about cases such as ANGRY-LOOKING JACK Siegel provides two arguments for the claim that Jill's belief is unjustified. These arguments ultimately serve to hinder attempts to deny the intuitive verdict that Jill's belief is unjustified. Siegel (2012) argues that Jill's belief is circular. Jill's belief that Jack is angry causes her experience of Jack as angry. Jill then takes this perceptual experience to support her belief that Jack is angry. Siegel compares this to a gossip circle:

GOSSIP CIRCLE: In a gossip circle, Jill tells Jack that p , Jack believes her but quickly forgets that she's the source of his belief, then shortly afterwards Jack tells Jill that p . It seems silly for Jill to take Jack's report that p as providing much if any additional support

not matter much here, as I will be arguing that a parallel problem arises in the case of linguistic understanding as part of normal interpretation.

⁴ The precise definition of cognitive penetration is controversial, but this rough characterisation will suffice for the sake of discussion.

⁵ Importantly, cognitive penetration will not always damage an experience's ability to justify beliefs. For example, one's experience might be influenced by one's wealth of expert knowledge. This might have epistemically beneficial effects. For example, a doctor may accurately perceive a grayish blob on an x-ray as a tumour.

for p , beyond whatever evidence she already had. On the face of it, this looks like a feedback loop in which no new justification is introduced. Similarly, when beliefs are formed on the basis of cognitively penetrated experience, it is as if your belief that p told you to have an experience that p , and then your experience that p told you to believe that p . Siegel (2012), 202.

If Siegel is correct then then the claim that Jill is justified does not amount to a mere denial of intuitions about ANGRY-LOOKING JACK. The immediate justification theorist is forced to maintain that seemingly circular beliefs can be justified. This ups the stakes for the immediate justification theorist.

Of course, Siegel may be wrong to claim that Jill's belief is circular. As Jack Lyons (2011) observes circularity is a problem with basing, and experiences do not seem like the sort of things that can be based. Indeed Siegel herself later claims that our perceptual beliefs are not not based on the mental states that penetrate our perceptual experiences. But if experiences *can* enter into basing relations, or if perceptual beliefs can be based on states which cognitively penetrate perception, then it certainly seems that Jill's belief is circular. It will be based in part on her prior belief that Jack is angry.

Siegel (2013) provides an alternative argument that Jill's belief is unjustified. This second argument does not assume that perceptual experiences can be based, or that perceptual beliefs can be based on anything other than perceptual seemings themselves. We start with the recognition that ill-founded beliefs are able to transmit their ill-foundedness to other beliefs. For example, if I come to believe that I will win the lottery purely on the basis of wishful thinking, and then infer from this that I will be able to pay the rent next month, then this latter belief will, like the former, be unjustified. The second belief, by being based on the first, inherits its ill-foundedness. Siegel asks what feature of belief allows it to transmit ill-foundedness. If it is some distinctive feature of belief then this might suggest that only beliefs can transmit ill-foundedness. However, if the feature by which beliefs transmit ill-foundedness is shared with perceptual seemings then this suggests that perceptual seemings will also be able to transmit ill-foundedness. Siegel considers three major differences between beliefs and perceptual seemings. She argues that none of these factors explain the ability of beliefs to transmit ill-foundedness, and concludes that the features which allow beliefs to transmit ill-foundedness are likely shared with experience.

Firstly she considers the fact that beliefs can be irrational, and perceptual seemings apparently cannot. She provides two reasons to reject the claim that it is the ability of beliefs to be irrational that explains their ability to transmit ill-foundedness. Firstly she points out that perfectly rational beliefs can help transmit ill-foundedness. For example, my belief that I will be able to pay the rent next month is not only based on the irrational belief that I will win the lottery. It is also based on my perfectly rational belief that lottery winners are awarded lots of money. Secondly, she points out that there can be irrational beliefs with no other irrational beliefs in their etiology. For example, one's irrational belief that one is in danger may be caused by one's fear of spiders combined with one's perfectly rational belief that there is a spider in the corner.

Next she considers the fact that beliefs, unlike perceptual seemings, can be formed via explicit reasoning. She argues that this cannot explain why beliefs are able to transmit ill-foundedness as many of our beliefs are not formed through explicit reasoning, yet they can still transmit ill-foundedness. Finally she considers the fact that beliefs, unlike perceptual seemings, are governed by norms of evidence responsiveness. Her first response is that our reliance on perceptual experience is governed by norms of evidence responsiveness, even if perceptual seemings themselves are not. For example, if I acquire evidence that I have been given a hallucinogenic drug then I should alter my credence in my recent perceptual beliefs. Thus the disanalogy is weak. Her second response is to point out that some of our beliefs are so deeply ingrained that they are not really revisable in response to evidence. Yet these beliefs may well be ill-founded, and they may well still transmit their ill-foundedness to other beliefs. Siegel concludes that whatever feature of belief allows it to transmit ill-foundedness is likely shared with perceptual seeming. Thus we have reason to believe that the etiology of a perceptual seeming, like the etiology of a belief, can affect the justificational status of beliefs based on that seeming.

Richard Fumerton (2013) denies that Siegel has offered compelling reasons to reject the thesis that it is the ability of beliefs to be irrational which explains their ability to transmit ill-foundedness. He distinguishes between cases of derived and non-derived irrationality. In cases of derived irrationality (such as my belief that I will be able to pay the rent next month) there must be an irrational belief for the irrationality to be derived from. Siegel's observation that rational beliefs can constitute part of the basis for an irrational belief does nothing to address the claim that in cases of derived irrationality the irrationality must be derived from an irrational belief. Cases of non-derived irrationality involve beliefs which are irrational by virtue of, for example, lacking any basis. If one's belief that one is in danger is caused by one's fear of spiders together with one's belief that there is a

spider in the room then one's belief is irrational simply because it lacks a sufficient basis. The irrationality is not transmitted from elsewhere. Fumerton concludes that beliefs, unlike perceptual seemings, are able to transmit ill-foundedness due to their ability to be rational or irrational. Of course, this response only works if, as Fumerton and Siegel both claim, experiences cannot be irrational. If they can be irrational, and it is this ability to be irrational that explains belief's ability to transmit ill-foundedness, then this suggests that perceptual seemings can also transmit their ill-foundedness.

We have discussed three reasons for thinking that the etiology of a perceptual experience can downgrade the justification it provides. Firstly there are cases in which justification is intuitively downgraded. Then there are Siegel's two arguments for downgrade in such cases. Firstly she argues that in cases like ANGRY-LOOKING JACK perceptual beliefs can be circular. Secondly, she argues that perceptual seemings likely share with beliefs the features which allow beliefs to transmit ill-foundedness. We have also seen two reasons to reject Siegel's arguments. Experiences arguably cannot be based, and Siegel has not established that it is not the ability of beliefs to be irrational which explains their ability to transmit ill-foundedness. If these responses are successful then Siegel's case will rest entirely on intuitions about cases like ANGRY-LOOKING JACK, and these intuitions are not universally shared.

In the remainder of this paper I will extend Siegel's argument, applying it to testimonial justification. Our understanding of what we have been told can be affected by our background mental states. As a result, cases parallel to ANGRY-LOOKING JACK can be given with respect to linguistic understanding. In these cases the seemingly testimonial belief is intuitively unjustified. The testimonial version of the problem has several distinctive features. Firstly, unlike Siegel's original argument, the testimonial variant of the problem does not only target internalist immediate justification views. It also undermines some externalist views of justification, including proper functionalist approaches to testimonial justification. Secondly, the testimonial variant of the problem does not rely on the controversial notion of cognitive penetrability. Thirdly, the testimonial variant of the problem is less reliant on intuitions about the justificational status of checkered beliefs. This is because testimonial beliefs can be based on the background states which affect our understanding of what is said, and such states of understanding can be irrational. Thus, Siegel's explicit arguments for the no justification verdict are stronger as applied to the testimonial variant of the argument.

2. Testimonial Belief and Understanding What is Said.

In the following sections we will be exploring etiological effects on states of apparent linguistic understanding. Before doing so it is worth saying a little about what is meant by 'linguistic understanding', and exploring the role of understanding in theorising about testimonial belief. Doing so will enable us to identify which views could potentially be rendered untenable by arguments from etiology.

When we hear others speak we hear their words as words, not as mere sounds. We hear assertions not as mere noises but as assertions, with a particular content. It is as if we perceive utterances as having a particular meaning and force⁶. I will, for the most part, follow Fricker (2003) in calling these apparent perceptions of meaning and force 'quasi-perceptions'⁷. Quasi-perceptions appear to play a central role in the normal process by which we acquire testimonial knowledge. It is via our quasi-perceptions of meaning that we form beliefs about what is said. We will distinguish different views of testimony in terms of their different commitments regarding whether or not we have a default right to take our quasi-perceptions at face value.

The main camps in the debate over testimonial justification are divided over whether or not agents must, if their testimonial belief is to be justified, possess reasons to accept the testimony. Anti-reductionists hold that we don't need positive reasons, reductionists maintain that we do. We can divide up these views in terms of the different claims which could be made about one's rights to rely on (or, accept the outputs of) an informant, and the rights one has to rely on one's own understanding.

Firstly, one could maintain that we have a default right to rely on our understanding, and that we have a default right to rely on the speaker. Call this position 'strong anti-reductionism'. Secondly, one could maintain that we have a default right to rely on the speaker, but we do not have a default right to rely on our understanding (call this view 'weak anti-reductionism'). Thirdly, one could maintain that we have a default right to rely on our understanding, but not to rely on speakers (call

⁶ This is not to say that such states are genuinely perceptual. Rather, they are phenomenologically similar to states of perception.

⁷ I use this term primarily because 'linguistic understanding' can be used in different ways. For example, it could be used for the state one is in when one knows a language, but doesn't have enough contextual knowledge to interpret a particular utterance. For example, if one finds a note saying 'I will be back in five minutes', but does not know who wrote the note, then there is a sense in which one understands the note without knowing what proposition is expressed (one is differently situated with respect to the note than someone who does not know English). This type of linguistic understanding plays a part in the determination of our quasi-perceptions, but it is not what I mean by 'linguistic understanding'.

this 'weak reductionism')⁸. Finally, one could maintain that we have neither a default right to rely on our understanding nor the speaker (call this 'strong reductionism').

Each of these views can be further distinguished on the basis of predictions they make about testimonial justification in what we can call the good and bad cases. In the good and bad cases audiences have indistinguishable quasi-perceptions. In the good case these quasi-perceptions are veridical, in the bad case they are inaccurate. A view which endorses symmetry between the good and bad cases will maintain that indistinguishable quasi-perceptions always provide the same justification, meaning that the same justification will be provided in good and bad cases. We can also identify weakened forms of symmetry. Weak symmetry holds that indistinguishable quasi-perceptions always provide the same justification as long as certain background conditions are in effect. Views which endorse symmetry will be forced to maintain that a quasi-perception with an improper etiology proffers the same justification as a quasi-perception with an unproblematic etiology. Views which endorse weak symmetry will make the same predictions so long as the postulated background conditions fail to account for the etiology of the quasi-perception.

Internalist versions of strong anti-reductionism and weak reductionism will tend to endorse symmetry. This is also true of some internalist views that do require audiences to possess positive reasons to trust the speaker or their faculties for comprehension. For example, Audi (1997) holds that we have a non-inferential immediate right to trust our faculties and the speaker, but he also holds that in order for justification to be conferred we must possess sufficient background information (even though we needn't appeal to this information in reasoning). As long as it is maintained that audiences in the bad case possess the same background beliefs which support justified belief in the good case then such views will also endorse a form of symmetry between the good and bad cases, as will inferential views⁹ (on the condition that the same background beliefs are held in each case)¹⁰.

In principle, externalist strong anti-reductionists or weak reductionists are able to avoid symmetry. This is because they can maintain that whether or not an agent is immediately justified in relying on their quasi-perceptions can depend on factors outside of the agent's ken. However, externalist variants of strong anti-reductionism and weak reductionism must still provide an account of the

⁸ Since weak reductionism still posits a distinctive irreducible epistemic right (the right to trust one's own understanding) it is not clear the extent to which it is really reductionist. It may be best thought of as a form of hybrid view.

⁹ For example Lyons (1997), Shogenji (2006), and Fumerton (2006).

¹⁰ This point parallels the points made by Ghijzen (forthcoming) about internalist theories of perception.

basis of our right to trust our understanding in the good case. As a result, they will usually endorse a form of weak symmetry. For example, proper function views (such as Graham (2006, 2010)) hold that if the function of a system (for example perception or comprehension) is to reliably produce true beliefs in a particular environment then the agent has a default defeasible epistemic right to trust the outputs of such systems (in any environment). With respect to comprehension Graham writes:

"If a subject *s* (seemingly) comprehends a (seeming) presentation-as-true by a (seeming) speaker that *p*, and if that causes or sustains in the normal way *S*'s belief that *p*, then that confers justification on *S*'s belief that *p*" Graham (2006), p 4.

Thus, Graham is committed to endorsing a form of weak symmetry between the good and bad cases (at least as long as the process of comprehension is not malfunctioning)¹¹. A similar view has been influentially presented by Burge (1993). Burge argues that if a system reliably produces truthful representations in its normal environment then agents have a default epistemic entitlement to the outputs of the system. This supports his 'acceptance principle' for testimonial beliefs, whereby we are entitled to accept testimony as long as we possess no defeaters. Expanding on this approach (and applying it to perception) Burge writes:

"To contribute to epistemic entitlement, a perceptual state (type) must be reliably veridical in the perceptual system's normal environment. The normal environment is the one by reference to which the perceptual content of the perceptual state is explained and established When a perceptual state is reliable in the normal environment, and certain other conditions on entitlement are met, the individual is entitled in any environment to perceptual beliefs that are appropriately derived from the perceptual state" Burge (2003), p 523.

Burge here seems similarly committed to a form of weak symmetry. It is important to note that proper function approaches to perception are able to avoid the perceptual variant of the argument from etiology. This is because when perceptual states acquire improper etiologies it is seemingly always the result of a malfunction in the process of perception. However, if it is possible for a state (such as a quasi-perception) to acquire an improper etiology without a malfunction in the processes

¹¹ Graham claims that the level of justification provided is not necessarily enough, by itself, to justify belief. In order to justify belief background beliefs may be required to supplement the justification provided by a state of apparent comprehension. This will not affect the argument of this paper since we can simply hold that audiences in the cases discussed possess the same background beliefs they possess in normal cases of justified testimonial belief.

underlying the state (such as the process of comprehension) then the problem will extend to proper function views. That is, proper function views will struggle to secure the no-justification intuition with respect to checkered testimonial beliefs.

3. Etiological Effects on Understanding.

In order to understand how quasi-perceptions can acquire potentially problematic etiologies it is worth considering two distinct components of quasi-perception, both of which might be influenced by background beliefs, attitudes, and associations¹². The contents of our quasi-perceptions are determined by our perceptions of certain sounds as words, and our assignment of meaning to those words (as well as other factors such as our grasp of underlying syntax). We will see that cases which parallel Siegel's can be given for both speech perception, and meaning assignment. However, the considerations in favour of the no-justification verdict are stronger with respect to cases of meaning assignment. Let us consider speech perception first, as it is closer to Siegel's primary target and, as a form of perception, plausibly falls under the scope of her original arguments.

3.1. Speech Perception.

Judgements about the beliefs, interests, and backgrounds of other interlocutors generate expectations concerning what they are likely to say, and thus about what words they are likely to use. There is reason to suspect that these judgements and expectations influence speech perception¹³. It is seemingly common to mistake one word for another on the basis of expectations about what a speaker is likely to say. We can construct cases analogous to Siegel's involving speech perception¹⁴:

INVESTMENT ADVICE: Sally has been tasked with headhunting an expert in currency swap options. However, she has been as yet unsuccessful, and is getting increasingly desperate. As she crosses the street she sees a man wearing jeans and a smart shirt and she, purely through wishful thinking, forms the belief that he is an expert on currency options. As it happens he is actually a social scientist who works on public opinions of markets. Sally asks him what he works on and he says 'I work on current opinions of markets'. However,

¹² I use the term 'components' loosely here. I do not mean to take a stand on the question of whether quasi-perceptions are composite states, or whether such a notion even makes sense.

¹³ As in the case of visual perception it is ultimately an empirical question whether speech perception is cognitively penetrable. For some preliminary suggestions that top down influences do influence speech perception see Davis and Johnsrude (2007), and McClelland (2011).

¹⁴ This case is based on a one I give in Peet (forthcoming), where I discuss the influence of prejudicial stereotypes on our understanding in the context of epistemic injustice.

due to her expectations (based on her wishful thinking) she hears him as having said 'I work on currency options markets'. Sally takes this apparent testimony at face value, and takes it to confirm her prior belief that the man works on currency options.

This case is no less plausible than Siegel's cases of cognitively penetrated visual perception. Sally has a quasi-perception of the man as having asserted that he works on currency options. Moreover, it does not look as if Sally possesses any defeaters concerning either her understanding, or the claim that the man works on currency options. The environment needn't be especially noisy, the assertion may well have sounded clear to Sally, and the man's appearance provides very little evidence concerning his occupation. The symmetrical strong anti-reductionist holds that if one has a quasi-perception as of a speaker saying p , and one has no reason to doubt the speaker, then one is justified in believing that p . Thus symmetrical strong anti-reductionism predicts that Sally's belief is justified. Moreover, Sally seemingly possesses the same reasons to trust the speaker that she would have in any other situation. Therefore the symmetrical weak reductionist and many internalist strong reductionists will also predict that Sally's belief is justified.

Yet this case seems to parallel ANGRY-LOOKING JACK. Sally's belief seems to have the same problematic features as Jill's belief that Jack is angry. It seems intuitively unjustified. It seems circular, since her seemingly testimonial belief that the man is an expert on currency options depends on her prior belief that he is an expert on currency options. And if quasi perceptions can transmit the ill-foundedness of states which bring them about then the ill-foundedness of Sally's original belief that Jack is angry is plausibly maintained even when it becomes based on her perceptual experience.

Although problematic this case is not conclusive. Firstly, this case is not problematic for the proper functionalist, since Sally's perceptual faculties seem to be malfunctioning. Such views are able to maintain that it is only the outputs of normally functioning systems to which we are entitled, thus Sally has no entitlement to her belief in this case.

Moreover, assuming that auditory perception is a-rational, it might be argued by the internalist that once Sally has heard the speaker as uttering the words "I work on currency options markets" she has no rational choice but to accept that the speaker works on currency options. After all, she surely cannot be rationally criticised for seeming to hear particular words¹⁵. This would be like rationally

¹⁵ It has been pointed out by an anonymous referee that there may be circumstances in which one can be criticised for

criticising someone for having a hallucination. It might then be maintained that if Sally cannot be rationally criticised then her belief is justified¹⁶. The viability of this response will depend on what one takes to be the relationship between rationality, justification, and blameworthiness. However, we needn't get into such issues here, as it will be argued in the following section that parallel arguments have less plausibility in response to interpretational analogues of this case. This is because, it will be argued, quasi-perceptions can, in some circumstances, be irrational. This also means that the interpretative version of the problem is able to resist Fumerton's response to Siegel's second argument for the no justification verdict. If it is the ability of beliefs to be irrational which explains their ability to transmit ill-foundedness then, since quasi-perceptions can be irrational, we have reason to believe that quasi-perceptions can transmit ill-foundedness.

3.2. Meaning Assignment.

Much of language is context sensitive. The assignment of meaning to context sensitive utterances requires that hearers draw upon their representation of the common ground, the conversational aims, the speaker's interests and character, and many other factors. This provides an obvious route for improper background belief to negatively affect linguistic understanding.

Indeed, even seemingly semantically insensitive assertions are often interpreted in a way that is sensitive to the needs of the context. Consider the term 'vulnerable'¹⁷. This is not standardly seen as a context sensitive term¹⁸. However, it can be used and understood in subtly different ways in different contexts. Consider two speakers, one is a member of a charity which provides blankets, food, and heating for old people living in poverty, the other is a member of a criminal gang that brazenly steals from old people who are unable to put up a fight. An utterance of 'Alice is vulnerable' will mean importantly different things in the mouths of each speaker (at least, in contexts where they are planning their respective activities). For one 'vulnerable' will mean 'at risk

seeming to hear something a particular way. For example, if you fail to pay proper attention and mishear as a result then one might be criticised for being careless.

¹⁶ This line of response is pursued by Michael Huemer (2013) in response to Siegel.

¹⁷ Similar examples using the word 'safe' are given in Fauconnier and Turner (2002) and Recanati (forthcoming).

¹⁸ As an anonymous referee points out, 'vulnerable' could be construed as context sensitive. It may be that bare 'vulnerable' needs saturation by some contextually supplied respect in which the object in question is vulnerable. If this is the case then background beliefs will always guide us in our assignment of a type of vulnerability. Likewise, if semantic meaning more generally is radically underdetermined then we will draw on our background representations in all cases of linguistic interpretation, leaving a great deal of scope for pernicious effects on understanding. According to radical contextualists such as Bezuidenhout (1997) and Carston (2002) linguistic communication is usually merely approximate, with what might be described as minor misunderstandings being commonplace. Moreover, many who reject widespread semantic context sensitivity embrace widespread context sensitivity with respect to the determination of speaker meaning. For example, semantic minimalists (such as Cappelen and Lepore (2004) and Borg (2004)) draw a strict distinction between semantic content, which they take to admit of very little context sensitivity, and speech act content, which they take to admit of a great deal of context sensitivity. On all such views there will be a great deal of scope for checkered testimonial belief.

from hunger and the cold' (this reading will be denoted as 'vulnerable₁'), for the other it will mean 'an easy/helpless target' (this will be denoted as 'vulnerable₂'¹⁹). Thus, the way we understand utterances containing the word 'vulnerable' will depend on the way we modulate the term (and whether or not we do modulate it) in response to the needs of the context. Since we rely on our representation of the context in assigning meaning, it should be clear that misrepresentations of the context can lead to misinterpretation. For example, if one falsely believed that the speaker of 'Alice is vulnerable' were a member of the criminal gang planning a robbery, then one would likely misinterpret the speaker as saying that Alice is vulnerable₂.

Our quasi-perceptions are perception-like experiences of utterances as having a particular meaning. The phenomenology of context sensitive or modulated speech perception is no different to that of context insensitive speech perception (if there is such a thing). Thus, the background representations which determine our modulations or assignment of meaning to context sensitive terms affect the contents of our quasi-perceptions. This would be the case even if our actual perception of the words spoken (and perception more generally) were cognitively impenetrable. The influence of background representations of the speaker on our assignments of meaning can generate cases which parallel Siegel's. Consider the following case:

JUROR JACK: Tom has been falsely accused of stealing from Alice, an old woman living in poverty. Jack is on the jury. As it happens Tom was simply in the wrong place at the wrong time. He was at Alice's home intending to offer her help. However, a robbery was in progress as he entered the premises. Prior to being selected for jury duty Jack has been watching crime dramas, and decides that Tom is guilty simply because he bears a resemblance to the primary villain in his favourite show. He conjures up a narrative in which Tom had been scheming to steal from poor defenceless Alice. So when Tom is asked why he was at Alice's residence, and he replies 'because she was vulnerable', Jack naturally interprets Tom as having revealed that he saw Alice as an easy target. He takes this to confirm his prior belief that Tom saw Alice as an easy victim, and that he was in fact the robber.

In this case Jack quasi-perceives Tom as saying that he saw Alice as vulnerable₂. We can imagine that he possessed no defeaters concerning his own understanding or Tom's honesty. Thus, he is,

¹⁹ It is important to note that these two readings are genuinely distinct. There are people who may fall in the extension of vulnerable₁ but not vulnerable₂. For example, a poor old lady trained in krav maga.

according to symmetrical strong anti-reductionism, symmetrical weak reductionism, and many internalist strong reductionist views, justified in believing on the basis of his quasi-perception that Tom saw Alice as vulnerable₂. Once again, this case seems to parallel Siegel's in most important respects. If we accept the no-justification verdict in Siegel's cases then we should accept it here.

Importantly, in this case Jack's belief does not have its improper etiology in virtue of a malfunction in the process of comprehension. He draws on his background representation of the speaker and the context in precisely the same way he would in any other case of context sensitivity or modulation²⁰. The difference is that in this case the background beliefs these processes drew upon were defective. Thus, the proper functionalist who maintains that we are entitled to the outputs of a non-malfunctioning system which functions to reliably produce true beliefs is also committed to claiming that Jack's belief is justified²¹.

In the previous section it was noted that one might bite the bullet and maintain that Sally was justified. The reasoning was that Sally cannot be blamed or judged irrational for mishearing the speaker. A similar worry may arise here. That is, one might still worry that, because Jack possesses no defeaters, he cannot be rationally criticised for trusting his understanding, and is therefore not rationally criticisable for his belief. This response has less plausibility in the case of Juror Jack.

Unlike perceptual seemings, which are arguably a-rational²², our quasi-perceptions can be irrational. For example, normally functioning individuals whose quasi-perceptions, in one-off cases, fail to track contextual evidence seem to be rationally criticisable in those cases²³. Suppose you point very

²⁰ Indeed, as noted in footnote 19, if meaning is radically underdetermined then we will draw on background representations in this way as part of normal interpretation. As an example of how this would work, consider the relevance theoretic view of comprehension: When a speaker utters a sentence containing a term *a* we form an initial ranking of meanings for the term, determined by strength of association between salient concepts and candidates for the meaning of *a*. We then check each candidate until we find one which meets our expectation of relevance (a measure of cognitive effects weighed against cognitive effort). In JUROR JACK Jack's initial ordering of meanings for 'vulnerable' will be affected by the fact that concepts such as "scheming" and "predatory" are highly salient to him, due to his association between Tom and the villain from his favourite TV show. Thus vulnerable₂ will be higher in his initial ranking than vulnerable₁. Since it will meet his expectation of relevance he will assign vulnerable₂ rather than vulnerable₁ to Tom's use of 'vulnerable'. For more on relevance theory see Sperber and Wilson (1986) and Carston (2002).

²¹ Notably, it is not clear that all who endorse proper function views of justification are committed to this claim. It is specifically those who hold that we are entitled to the outputs of particular systems who are committed to this view. Others, for example Bergmann (2004) who maintain that a malfunction in any process which contributes to the production of the belief will be able to avoid this prediction. This is because the belief upon which Jack bases his interpretation resulted from a defective belief formation procedure.

²² Markie (2013) claims that perceptual seemings themselves can be rationally assessable. He maintains that in cases of problematic cognitive penetrability of perception the perceptual seeming itself is epistemically inappropriate. If Markie is correct then perceptual seemings would parallel quasi-perceptions in this respect.

²³ This claim does not extend to those who are generally incapable of recognising contextual cues, for example high functioning people with autism.

clearly at an apple and say 'that is my apple'. If I were to see your gesture and yet still misunderstand you and take you to be talking about a different apple, despite your clear gesture, you would be within your rights to criticise me. Indeed, I would surely be irrational if I were to see your clear gesture and yet still take you to be talking about a different, contextually non-salient apple. This is not the case for faulty perceptual seemings. For example, if I hallucinated, or merely had some strange preoccupation with a particular apple which caused me to perceive you as pointing to the wrong apple then you would not be able to hold me accountable for any epistemic wrongdoing.

It is important to be clear on why agents are criticisable for their quasi-perceptions in such cases. The agents are criticisable because their quasi-perceptions are not properly responsive to the evidence. That is, the quasi-perception themselves are irrational in much the same way as beliefs which are not supported by the believer's evidence. This is important, as it is easy to worry that although the agent may be criticisable, their belief might still be justified (or their quasi-perception be rationally permissible). This would be the case if, for example, the agent was careless in their evidence gathering, but formed the belief justified by the evidence they did acquire. When I take you to be referring to the wrong apple I do so despite having seen your gesture. The rational interpretation on the evidence I possess is that you are referring to the apple to which you are in fact referring. But I fail to correctly respond to the evidence. Likewise, Juror Jack's evidence does not support his interpretation of Tom. The beliefs which lead to his interpretation were completely irrational. They fail to support his interpretation of Tom in much the way they would fail to support any belief about Tom. It is Jack's quasi-perception itself which is irrational. The problem does not lie purely with Jack's evidence gathering practice²⁴. The upshot of this is that even if Jack can't be criticised for the move from understanding to belief he can be criticised for his understanding.

This also helps us see why Siegel's second argument for the no-justification verdict about cases like ANGRY-LOOKING JACK is stronger when applied to cases like JUROR JACK. Fumerton (2013) was able to respond to Siegel that beliefs and experiences are importantly different: beliefs, but not

²⁴ Thanks to an anonymous referee for pushing me to consider the notion that it is the agent but not the belief or quasi-perception that is criticisable in cases such as this. A similar criticism might be raised not about quasi-perceptions themselves but rather the beliefs based on them: perhaps these beliefs are not unjustified, but the believers are criticisable because of their improper evidence acquisition practice. This response is unpromising. It might help explain the no justification intuition about cases such as JUROR JACK and ANGRY LOOKING JACK, but it does not address Siegel's explicit arguments for the claim that the beliefs in such cases are unjustified. For example, if a belief is based on circular reasoning, then the belief itself is unjustified. This is not simply a case of the agent but not the belief being criticisable. Thus, if the circularity diagnosis is plausible (as I shall argue in section four) then we should conclude that the no-justification intuition is explained by the fact that the belief itself is unjustified, not the fact that the agent is criticisable in some other way.

experiences, can be irrational. The ability of beliefs to be irrational seems like a good candidate for the feature of belief which allows it to transmit ill-foundedness, and Siegel's argument against this hypothesis are unconvincing. However, quasi-perceptions, like beliefs, can be irrational. So there is no disanalogy between quasi-perception and belief in this respect.

4. Circularity and Basing.

We have seen that cases parallel to Siegel's can be given for testimonial belief. These cases can be given in terms of speech perception and meaning assignment. In the case of meaning assignment it appeared that, in addition to internalist views, proper function views also struggle to secure the no-justification verdict. Moreover, it was seen that two key responses to the no-justification verdict - that the agent is justified since they are not rationally criticisable, and that the state which provides the basis for belief (perceptual seeming or quasi-perception) is importantly disanalogous to belief, had less plausibility when applied to cases of checkered testimonial belief via defective meaning assignment.

However, perhaps the strongest argument for the no justification verdict is that cases such as ANGRY-LOOKING JACK and JUROR JACK involve circularity. It was noted earlier that there are reasons to be sceptical of the circularity diagnosis as it applies in the case of perception: circularity involves basing, and it is not clear that perceptual beliefs can be based on the background mental states which may influence them. It will be argued in this section that there is reason to believe that testimonial beliefs can be, in part, based on the background mental states which influence meaning assignment. Thus, the circularity view has greater plausibility when applied to cases of checkered belief via defective meaning assignment. Thus, we have more reason to endorse the no-justification verdict with respect to such checkered testimonial beliefs.

There are two objections to the claim that checkered perceptual beliefs are based on the penetrating states. Jack Lyons (2011) argues that perceptual seemings are not the sort of things which can be based²⁵. Lyons says little in defence of this claim, however it is not implausible. After all, it seems you cannot receive evidence for or against a perceptual seeming. Seemings are apparently not responsive to reasons. It does not (in most contexts) make sense to ask someone why they see a banana as yellow for example. The answer will simply be 'it just looks yellow'.

²⁵ This claim does not sit well with all views of perception. For example, according to Glüer (2009), and Byrne (2009) perceptual states are doxastic states. If all doxastic states can be based, then so can perceptual states. Moreover, Markie (2013) specifically claims that perceptual seemings can be based.

Siegel (2013a) also argues that perceptual beliefs cannot be based on the states that constitute their etiology. However, her argument does not rest on the claim that seemings themselves cannot be based. She points out that if a belief B_1 is based on another belief B_2 then a change in B_2 will usually trigger a change in B_1 . However, we rarely adjust beliefs based on a checkered experiences in response to changes in the checkering state. For example, if you were petrified of guns, and this fear caused you to see something in your fridge as a gun, then you would not lose your belief that there was a gun in the fridge upon losing your fear of guns. You would still think that you saw a gun. Siegel's reasoning here employs a dispositional conception of basing, and specifically concerns the ability of perceptual beliefs (rather than perceptual states) to be based on checkering states.

It might be thought that these worries extend to the testimonial version of the problem. That is, it might appear that quasi-perceptions are not the kind of things which can be based either. After all, the phenomenology of quasi-perception is similar to that of normal perception. I will suggest that there is reason to think that testimonial beliefs are, in part, based on background mental states which affect interpretation. Moreover, I will suggest that quasi-perceptions themselves may be susceptible to basing.

Siegel's main reason for avoiding the claim that checkered beliefs are based on the checkering process is that a change in the penetrating state will not usually trigger a change in the checkered belief. This claim has less plausibility in the case of checkered testimonial belief²⁶. We experience miscommunication often, and we are accustomed to adjusting our beliefs about what we have been told when we adjust our conception of the of what the speaker's aims, beliefs, and interests were at the time of utterance. Sometimes these reassessments are explicit, other times they merely affect the way that we recall a situation. Consider the following situation:

LAWN MOWER: Gohir and his child Zamyra are meeting his new partner's parents, Matthew and Sally, for the first time. Zamyra asks if she can ride on Matthew and Sally's ride on lawn mower, and Matthew asks Sally 'is it safe?', to which Sally responds 'it would not be safe'. Gohir naturally takes Matthew to be checking whether or not the ride on lawn mower would be a safe item for a child to ride on. However, as the discussion progresses it becomes increasingly clear that Matthew and Sally really love their ride on lawn mower, and are highly protective over it - it is their pride and joy. Gohir revises his belief and now takes

²⁶ Although, it is not obvious that this is true even in the case of perception.

Matthew to have been asking whether the ride on lawn mower would be at risk of being damaged if ridden by a child, and Sally to have been confirming that the lawn mower would be at risk.

In this case Gohir's quasi-perception was influenced by his expectations regarding the concerns and priorities of normal human adults. As his impression of the speakers changed however he revised the belief he formed on the basis of this quasi-perception, suggesting that the testimonial belief he formed (that the lawn mower was not safe for children/that the lawn mower may be damaged by a child) was partly based on the expectations which influenced his understanding of the speaker. I do not mean to claim that we always revise our beliefs in such situations, merely that such revisions are not unusual or surprising. This stands in contrast to the case of perceptual cognitive penetrability. Unless one had been exposed to psychological research on cognitive penetrability then it would not occur to one, upon losing one's fear of guns, that one's fear of guns played a role in one's perceptual experience. Thus one would not revise one's belief. If Siegel's disposition to revise heuristic is a good way of diagnosing basing, then it seems that testimonial beliefs are, in some cases (in the relatively mundane cases in which the agent would be disposed to revise their belief), at least partly based on background mental states which affect interpretation. We can postulate that JUROR JACK is one such case. That is, we might suppose that his initial impression of Tom is over-ridden by the testimony of numerous character witnesses. In response it is would not be unusual for Jack to revise his belief that Tom saw Alice as an easy target.

Certainly it might seem that Siegel's dispositional heuristic cannot be employed to suggest that quasi-perceptions themselves can be based²⁷. Quasi-perceptions are immediate seemings, they do not seem like the sort of things we can revise. Of course, this might just be taken to suggest that dispositional heuristics are not reliable indicators of basing for non-doxastic states (or even for all doxastic states if, for example, a doxastic view of perception is correct). However, it does appear that some sense can be made of the notion of dispositions to revise quasi-perceptions. When we revise a belief we do not revise its content (to do so would simply be to form a different belief²⁸),

²⁷ It might also be thought that quasi-perceptions cannot be based as they are not beliefs. 'Basing' is a theoretical term, and it can certainly be used in such a way that it only applies to beliefs. However, circularity is a problem of improper evidence responsiveness, and irrationality. And it certainly seems states other than belief can be improperly evidence responsive and irrational (fears, for example). Thus, the view that circularity is a problem of basing, and the view that only beliefs can be based, should not be held together without independent argument.

²⁸ This is assuming the truth of content essentialism - the hypothesis that beliefs have their contents essentially. If content essentialism is false then, in theory, one and the same belief token could have different (incompatible) contents. Content essentialism appears to be presupposed by mental state externalism, thus at the very least Tyler Burge (one of the primary targets of this paper) is committed to it. See David (2002) for more on content essentialism and its connection to externalism.

rather we alter the role it plays in our reasoning. In the same way, we can adjust the role we allow a quasi-perception (or, a normal perception) to play in our reasoning. For example, we can cease to form beliefs on the basis of a quasi-perception we know to be defective, or we can revise previously held beliefs which were only supported by the quasi-perception. In this sense then, quasi-perceptions (and, indeed, normal perceptions) do seem revisable.

A final suggestive point in favour of basing quasi-perceptions is that quasi-perceptions, unlike perceptual seemings, can sometimes be retrospectively rationalised and justified. For example, if someone points to an apple and says 'that is red' you will have a quasi-perception of their utterance as meaning that the particular apple they are pointing at is red. If asked why you understood the speaker as saying that the apple was red you would be able to quickly respond 'because I saw her pointing at the apple'. This suggests that your quasi-perception was evidence responsive. That is, it was partially based on your perceptual experience of the speaker pointing to a particular apple²⁹. This apparent basing seems to be accessible to consciousness, even though the phenomenology is non-inferential³⁰.

In this section we have identified several reasons to hold that testimonial beliefs can be partially based on beliefs which influence meaning assignment. This is significant since it allows for circularity in cases in which a testimonial belief has a deficient etiology via defective meaning assignment. This stands in contrast to the case of perception where the circularity hypothesis had less plausibility, meaning that the case for the no-justification verdict rested more heavily on intuitions about cases of checkered perceptual beliefs.

5. Defeaters and Monitoring.

I have argued that views which endorse symmetry and a default right to trust one's understanding struggle to secure the no-justification verdict with respect to cases of checkered testimonial belief via defective meaning assignment. I have also argued that the no-justification verdict has greater plausibility in the case of checkered testimonial belief. It might be argued that this result can be

²⁹ McGrath (Forthcoming) advances a similar point with respect to perceptual seemings. He argues that when one sees an avocado and forms the belief that 'that is an avocado' one's belief is partially dependent on one's prior knowledge of what avocados look like. Despite the phenomenology, he argues, such knowledge is mediate. The same seems to be true of beliefs based on quasi-perceptions.

³⁰ Considerations along these lines have been taken to show that linguistic understanding consists in inferential propositional knowledge (for example, Stanley (2005)). Stanley argues that linguistic understanding is always based on contextual knowledge because such knowledge is required in order for us to tell whether or not an assertion violates the Gricean maxim of manner, and thus whether or not it should be interpreted literally. However, even if we do not accept such an extreme conclusion, these considerations still seem strongly suggestive of the hypothesis that states of quasi-perception, despite their phenomenology, can be based.

avoided simply by the inclusion of a no defeater clause. This response can be spelled out different ways. It can be spelled out in terms of subpersonal monitoring for signs of unreliability, or it can be spelled out in terms of doxastic defeaters.

The monitoring theorist will maintain that although audiences need not possess positive reasons to trust the speaker or their own understanding, they must nonetheless be sensitive to signs that their understanding (or the speaker) is unreliable³¹. We might, for example, be sensitive to indicators such as hearing exactly what we wanted to hear, which suggest that wishful thinking has played a part in interpretation³².

The monitoring response is problematic. It might provide a plausible account of Sally's belief, but quasi-perceptions can acquire improper etiologies without any deviant influences such as cognitive penetrability. They can acquire improper etiologies simply through background mental states (such as attitudes and beliefs) influencing interpretation the same way they do in the good case. For example, in cases of semantic context sensitivity or modulation we rely on our representation of the speaker in determining the correct interpretation. Many of the problem cases arise when these background representations of the context are themselves irrationally formed. The actual process by which these representations are drawn upon in interpretation are the same across both the good and bad cases. Thus, in many cases there is nothing unusual for the monitoring mechanism to pick up on (at least, nothing that it would not pick up on in the good case as well).

A second version of the defeater response holds that the agents in the cases I have presented possess doxastic defeaters for their beliefs. That is, it might be thought that the majority of adult speakers have enough experience to know the sorts of situations in which they are likely to misinterpret people. The plausibility of this response will depend on the defeaters which are postulated. Once again the response seems to work better for Sally than for Jack. Perhaps any agent in Sally's situation could be expected to be wary of their interpretation. After all, we all know that we sometimes misinterpret or mishear people in high stakes situations, especially when we really want to hear a particular thing. It is harder to see what defeater Jack might possess. I think that the most

³¹ Monitoring for signs of untrustworthiness has been shown to be unreliable (see Michaelian (2010) for an overview), and Keysar and Henley (2002) argue that interlocutors are not as reliable at spotting misinterpretations as they usually assume. Nonetheless it is worth considering the monitoring response, since monitoring requirements are still commonly postulated by epistemologists.

³² It is debatable whether monitoring is compatible with anti-reductionism. It has been argued that monitoring is compatible with anti-reductionism as long as the monitoring is subpersonal (and thus not part of the audience's agent level reasoning) See Goldberg and Henderson (2006) for a view along these lines, see Fricker (2006) for a response).

promising way to develop this objection is to hold that there are certain very general defeaters possessed by all adult speakers which serve to block default trust in one's quasi-perceptions in almost all cases. For example, every adult speaker is surely aware of the fact that we sometimes misinterpret one-another. Perhaps this serves as a defeater to Jack's reliance on his understanding. Of course this defeater is also present in the good cases, so we would have to maintain that the default right of adult speakers to rely on their understanding is always defeated. However, this conclusion might be embraced. After all, it might be thought that adults possess enough positive and negative information that they do not need to rely on default rights to achieve testimonial knowledge. On such a view anti-reductionism and reductionism will only differ in their predictions about the testimonial beliefs of small children.

Unfortunately, even the general defeater approach will not help. This is because we can produce cases of problematic etiology involving small children who are not yet experienced enough to possess general beliefs about miscommunication. Consider the following case:

MARBLES: Tommy, a small child, has a collection of marbles. He is very proud of his marbles, and he thinks of them constantly. As a result, whenever anyone talks about marbles he takes them to be talking about his marbles (even when he has no reason to think they would know about his marbles). One day at playgroup the playgroup leader says 'the marbles are very special', intending to refer to the marbles available for the children at the play group. However, Tommy misinterprets her, and takes her to be talking about his marbles. Indeed, he does so partly on the basis of his prior belief that his marbles are very special. Tommy thus reaffirms his belief that his marbles are special.

In this case Tommy has a quasi-perception of the playgroup leader as saying that his marbles are very special. He has no positive reason to distrust his play group instructor, and he is too young to possess any defeaters concerning the reliability of his ability to interpret others. He might not even be aware of the phenomenon of misinterpretation. Thus, views which endorse both symmetry and a default right to trust one's understanding predict that his belief is justified. Yet, his belief seems epistemically problematic in much the same way as Juror Jack's belief.

6. Conclusion.

It has been argued that cases of checkered testimonial belief can be given, based on both defective

speech perception and defective meaning assignment. It has been argued that several views of testimonial justification, especially symmetrical strong anti-reductionism, symmetrical weak reductionism, and many internalist strong reductionist views, fail to secure the result that such beliefs are unjustified. This constitutes a wide range of views of testimonial justification. It might be worried that if cases like ANGRY-LOOKING JACK and JUROR JACK are problematic for a very wide range of views of justification then we should be skeptical with respect to our intuitions about such cases. Thankfully the case for the no-justification verdict about such cases does not just rest on intuitions. Siegel presents two independent arguments for the no-justification verdicts about such cases, and I have argued that the case for the no justification verdict is even stronger with respect to checkered testimonial beliefs than it is with respect to checkered perceptual beliefs.

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Bibliography

- Bergmann, M. 2004. Externalist Justification Without Reliability. *Philosophical Issues*. 14. 35-60.
- Bezuidenhout, A. 1997. The Communication of De Re Thoughts. *Noûs*. 31 (2). 197-225.
- Burge, T. 1993. Content Preservation. *Philosophical Review*. 102 (4). 457-488.
- Burge, T. 2003. Perceptual Entitlement. *Philosophy and Phenomenological Research*. 67. 503-548.
- Byrne, A. 2013. Experience and Content. *Philosophical Quarterly*. 59 (236). 429-452.
- Carston, R. 2002. *Thoughts and Utterances: The Pragmatics of Explicit Communication*. Oxford: Blackwell.
- Christensen, D., Kornblith, H. 1997. Testimony, Memory, and the Limits of the A Priori. *Philosophical Studies*. 86. 1-20.
- Cohen, S. 2002. Basic Knowledge and the Problem of Easy Knowledge. *Philosophy and Phenomenological Research*. 65 (2). 309-329.
- David, M. 2002. Content Essentialism. *Acta Analytica*. 17. 103-114.
- Davis, M., Johnsrude, I. 2007. Hearing Speech Sounds: Top Down Influences on the Interface Between Audition and Speech Perception. *Hearing Research*. 229. 132-147.
- Fauconnier, G. Turner, M. 2002. *The Way we Think*. New York: Basic Books.
- Fricker, E. 2003. Understanding and Knowledge of What is Said. From A Barber (Ed) *Epistemology*

of Language (pp 325-367). Oxford University Press.

Fricker, E. 2006. Varieties of Anti-Reductionism About Testimony: A Response to Goldberg and Henderson. *Philosophy and Phenomenological Research*. 72. (3). 618-628.

Fumerton, R. 2006. The Epistemic Role of Testimony: Internalist and Externalist Perspectives. From Lackey and Sosa (Eds), *The Epistemology of Testimony* (pp 77-92). Oxford: Oxford University Press.

Fumerton, R. 2013. Siegel on the epistemic impact of 'checkered' experience. *Philosophical Studies*. 126. 733-739.

Glüer, K. 2013. In Defence of the Doxastic View of Perception. *Mind and Language*. 24 (3). 297-327

Goldberg, S., Henderson D. 2006. Monitoring and Anti-Reductionism in the Epistemology of Testimony. *Philosophy and Phenomenological Research*. 72 (3). 576-593.

Graham, P. 2006. Liberal Fundamentalism and its Rivals. From Lackey and Sosa (Eds), *The Epistemology of Testimony* (pp 93-115). Oxford University Press.

Graham, P. 2010. Testimonial Entitlement and the Function of Comprehension. From Pritchard, Duncan., Miller Alan., and Haddock, Adrian. (Eds), *Social Epistemology*, 148-174. Oxford University Press.

Huemer, M. 2001. *Skepticism and the Veil of Perception*. Rowman and Littlefield Publishers, Inc.

Huemer, M. 2013. Epistemological asymmetries between belief and experience. *Philosophical Studies*. 162 (3). 741-748.

Lyons, J. 2006. Testimony, Induction, and Folk Psychology. *Australasian Journal of Philosophy*. 75 (2). 163-178.

Lyons, J. 2011. Circularity, Reliability, and the Cognitive Penetrability of Perception. *Philosophical Issues*. 21. 289-311.

Malmgren, A. 2006. Is There A Priori Knowledge by Testimony? *Philosophical Review*. 115 (2). 199-241.

Markie, P. 2005. The Mystery of Direct Perceptual Justification. *Philosophical Studies*. 126. 347-373.

Markie, P. 2006. Epistemically Appropriate Perceptual Belief. *Noûs*. 40 (1). 118-142.

Markie, P. 2013. Searching for True Dogmatism. In Tucker (Ed) *Seemings and Perceptual Justification*, pp 248-268. Oxford University Press.

McGrath, M. 2013. Phenomenal Conservatism and Cognitive Penetrability: The Bad Basis Counterexamples. In Tucker (Ed) *Seemings and Perceptual Justification*, pp 225-247. Oxford University Press.

- McGrath, M. Forthcoming. Knowing What Things Look Like. *Philosophical Review*.
- McClelland, J., Mirman, D., Holt, L. 2006. Are there Interactive Processes in Speech Perception. *Trends in Cognitive Science*. 10 (8). 363-369.
- Peet, A. Forthcoming. Epistemic Injustice in Utterance Interpretation. *Synthese*. 1-23.
- Pryor, J. 2000. The Skeptic and the Dogmatist. *Noûs*. 34 (4). 517-549.
- Recanati, F. Forthcoming. From Meaning to Content: Issues in Meta-Semantics. From Ball and Rabern (Eds), *The Science of Meaning*. Oxford: Oxford University Press.
- Schellenberg, S. 2013. Experience and Evidence. *Mind*. 122 (487). 699-747
- Shogenji, T. 2006. A Defence of Reductionism About Testimonial Justification of Beliefs. *Noûs*. 40 (2). 331-346.
- Siegel, S. 2012. Cognitive Penetrability and Perceptual Justification. *Noûs*. 42 (2). 201-222.
- Siegel, S. 2013a. The Epistemic Impact of Etiology of Experience. *Philosophical Studies*. 162. 697-722.
- Siegel, S. 2013b. Can Selection Effects on Experience Influence its Rational Role? From Gendler and Hawthorne (Eds), *Oxford Studies in Epistemology, Vol 4* (pp 240-268). Oxford: Oxford University Press.
- Siegel, S. Silins, N. 2014. Consciousness, Attention, and Justification. From Dodd and Zardini (Eds), *Skepticism and Perceptual Justification* (pp 149-166). Oxford: Oxford University Press.
- Sperber, D., & Wilson, D. (1986). *Relevance: Communication and cognition*. Oxford/Cambridge, MA: Blackwell/University Press
- Stanley, J. 2005. Hornsby on the Phenomenology of Speech. *Proceedings of the Aristotelian Society: Supplementary Volume*. 79. 131-145.
- Stokes, D. 2012. Perceiving and Desiring: A new look at the cognitive penetrability of experience. *Philosophical Studies*. 158. 479-492.
- Vahid, H. 2014. Cognitive Penetration, the Downgrade Principle, and Extended Cognition. *Philosophical Issues*. 24. 439-459.
- Wright, C. 2002. (Anti-)sceptics simple and subtle: G.E. Moore and John McDowell. *Philosophy and Phenomenological Research*. 65 (2). 330-348.