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COMBATING ANTI ANTI-LUCK EPISTEMOLOGY

B.J.C. Madison

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Abstract: One thing that nearly all epistemologists agree upon is that Gettier cases are decisive counterexamples to the tripartite analysis of knowledge; whatever else is true of knowledge, it is not merely belief that is both justified and true. They now agree that knowledge is not justified true belief because this is consistent with there being too much luck present in the cases, and that knowledge excludes such luck. This is to endorse what has become known as the 'anti-luck platitude'.

But what if generations of philosophers have been mistaken about this, blinded at least partially by a deeply entrenched professional bias? There has been another, albeit minority, response to Gettier: to deny that the cases are counterexamples at all.

Stephen Hetherington, a principal and vocal proponent of this view, advances what he calls the 'Knowing Luckily Proposal'. If Hetherington is correct, this would call for a major re-evaluation and re-orientation of post-Gettier analytic epistemology, since much of it assumes the anti-luck platitude both in elucidating the concept of knowledge, and in the application of such accounts to central philosophical problems. It is therefore imperative that the Knowing Luckily Proposal be considered and evaluated in detail.

In this paper I critically assess the Knowing Luckily Proposal. I argue that while it draws our attention to certain important features of knowledge, ultimately it fails, and the anti-luck platitude emerges unscathed. Whatever else is true of knowledge, therefore, it is unlucky true belief. For a proposition to count as knowledge, we cannot arrive at its truth accidentally or for the wrong reason.

[Keywords: Epistemology; Knowledge; Gettier; Luck]

1. The Tripartite Analysis of Knowledge and the Gettier Problem

Philosophers agree on very little. Disputes in epistemology are no different in this regard. But one thing that nearly all epistemologists agrees on, however, is that whatever else is true of knowledge, it is more than mere true belief: this is so since true belief is compatible with the belief being true by sheer fluke, whereas it is thought that knowledge excludes such chanciness. Following Duncan Pritchard [2007], call this the anti-luck platitude.

Of course the traditional suggestion is that it is *justification* that marks the difference between true belief and knowledge.[1] Justification here is being conceived of as having good reasons, evidence, or grounds for believing what one does. While one might dispute that it is justification so-conceived that marks the difference between true belief and knowledge, it is still fairly uncontentious that true belief is insufficient for knowledge and therefore something, whatever it is, makes the difference between true belief and knowledge.[2] According to the tripartite analysis of knowledge, justification, truth and belief (JTB) are necessary, and jointly *sufficient* for knowledge.[3] The thought was that justification is what is needed to rule out the kind of luck present in the cases of mere true belief that fails to amount to knowledge.

Enter Edmund Gettier. In perhaps what has become the most famous paper in contemporary epistemology, Gettier [1963] provided a pair of putative counterexamples that aim to show that JTB is *insufficient* for knowledge. Here are versions of two classic Gettier cases:

1) DOG / SHEEP:[4] Suppose Al seems to see a dog on the lawn and on that basis infers that there *is* a dog on the lawn. Suppose further that what he sees is not a dog, but rather only a cleverly disguised sheep. Unbeknownst to Al, however, there just so happens to *also* be a dog on the lawn (perhaps just out of view behind a tree). Here Al believes that there is a dog on the lawn, it is true that there is a dog on the lawn, and since he has overwhelming evidence that there is a dog on the lawn (it plainly looks like a dog in front him, after all!), intuitively Al is *justified* in believing that there is a dog on the lawn.

However, does Al *know* that there is a dog on the lawn? Surely not. There is too much luck around.

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[1] For an early statement of what is arguably a version of the tripartite analysis, see Plato's *Meno* 97a-98b and his *Theatetus* 200d-210c.

[2] A minority of philosophers, however, have argued that true belief *is* sufficient for knowledge. See for example, [Sartwell 1991] and [Sartwell 1992]. Hetherington [2007] argues that true belief *could* suffice for knowledge, depending on what possible world we are in. See that paper for an argument that aims to cast doubt view that knowledge entails justification.

[3] Endorsers of versions of such an analysis include [Chisholm 1957: 16] and [Ayer 1956: 34].

[4] This case is adapted from Chisholm [1989].

2) FAKE BARNS:[5] Suppose Al stares out into a field of fake barns, subjectively indistinguishable from the real thing. In the centre of this field deep in fake barn country is a *real* barn. Suppose Al happens to look at the real barn amidst the fakes and believes, *that is a barn*. Here Al believes it is a barn, it is true it is a barn, and since he has overwhelming evidence that it is a barn (it plainly looks like a barn!), intuitively he is *justified* in believing that it is a barn.

However, does Al *know* it is a barn? Surely not. There is too much luck around.

While the details of Gettier cases vary, they share a common structure. Notably, luck is always present in a Gettier case. There is always some odd or strange way that the justified belief is made true, in that the belief *would* have been false, but for some strange twist of good luck.[6]

In the aftermath of Gettier's paper, various conclusions were drawn from the cases.[7] But what nearly all parties to the dispute agree on is that Gettier cases are decisive counterexamples to the tripartite analysis; whatever else can be said of knowledge, it is not merely justified true belief. What they now agree upon is that the reason that knowledge is not justified true belief is because this is consistent with there being too much luck present in the cases, and that knowledge excludes such luck. Again, this is simply to endorse the anti-luck platitude.[8]

But what if generations of philosophers have been mistaken about this, blinded by, among other things, a deeply entrenched professional bias? There has been another,

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[5] This case is adapted from Goldman [1992].

[6] Obviously a proviso is needed to rule out beliefs that could not be false, e.g. those that involve singular thought, or necessary truths. My primary focus will therefore be on beliefs in contingent truths, with the question of how to extend this account to necessary truths left for another occasion. For an attempt to so extend the account, see [Pritchard 2009], especially chapters 2-4.

[7] For a sample of some very different conclusions drawn from these cases, see [Kaplan 1985]; [Conee 1988]; [Swinburne 1995] and [Swinburne 2001]; and [Williamson 2000].

[8] One might agree that luck is present in Gettier cases, but still wonder if this is a mere correlation or constant conjunction or whether it is the presence of the luck that *explains* why knowledge is absent. Evidence that knowledge is absent *because* there is luck can be seen by appreciating that there is a formula for generating Gettier cases. For more on this formula, see [Zagzebski 1994: 69].

Given this formula, and the fact that all Gettier cases involve luck, and that no Gettier cases lack such luck, it is reasonable to conclude that Gettier cases arise *because* of the presence of the luck.

albeit minority, response to Gettier: to deny that the cases are counterexamples at all.[9] One way of resisting these counterexamples is by denying that the subjects of Gettier cases really lack knowledge. While this option has had few advocates, it is an important option that needs to be considered. Stephen Hetherington, the principal champion of the view, calls this the 'Knowing Luckily Proposal' [Hetherington 2005]; see also [Hetherington 1998], [Hetherington 2001] and [Hetherington forthcoming]. If this provocative and original proposal is correct, it would call for a major re-evaluation and re-orientation of post-Gettier analytic epistemology, since much of it assumes the anti-luck platitude both in elucidating the concept of knowledge[10], and in the application of such accounts to central philosophical problems, such as scepticism.[11] It is therefore imperative that the Knowing Luckily proposal be considered and evaluated in detail, since while most philosophers working on epistemic luck and the Gettier problem tend to note Hetherington's dissenting thesis in passing, so far it has not received the attention and evaluation it deserves as the best example of an approach to the Gettier problem that holds that the alleged problem, and subsequent epistemology formulated in response to it, is based on a mistake.

In the rest of this paper I will critically assess the Knowing Luckily proposal. I will argue that while it draws our attention to certain important features of knowledge, ultimately it fails, and the anti-luck platitude emerges unscathed. Whatever else is true of

[9] Also, some 'experimental philosophers' have gathered empirical data that they claim casts doubt on the reliability and probative value of our intuitive judgements about Gettier cases. See for example [Weinberg, Nichols and Stich 2001].

[10] For example, in the development of process reliabilism [Goldman 1979] and [Goldman 1986]; virtue epistemology [Greco 1999], [Greco 2000], [Zagzebski 1996]; modal anti-luck epistemologies [Dretske 1971] and [Nozick 1981] for Sensitivity based accounts; [Sosa 1999], [Pritchard 2005] and [Pritchard 2007] for Safety based accounts, etc.

[11] See for example [DeRose and Warfield 1999]; [Greco 2009].

knowledge, therefore, it is unlucky true belief. For a proposition to count as knowledge, we cannot arrive at its truth accidentally or for the wrong reason.

2. The Knowing Luckily Proposal

Stephen Hetherington has defended what he calls the Knowing Luckily Proposal, which amounts to the denial of the anti-luck platitude ([Hetherington 2005] introduces the proposal under this label; see also [Hetherington 1998], and [Hetherington 2001] Chapter 3 for versions of this proposal). The claim is that while most knowledge is not had through luck, some of it can be. That is to say, justified true belief *is* sufficient for knowledge. Hetherington argues that in Gettier cases knowledge *is* present, although the subject *almost* lacks it, and philosophers have easily confused one for the other. Hetherington maintains that such knowledge is therefore had less securely or stably, but knowledge is still had all the same. The keys to Hetherington's Knowing Luckily Proposal are the following:

1) 'The Epistemic Counterfactuals Fallacy': Hetherington argues that it is a fallacy to infer from a counterfactual lack of knowledge that a subject *actually* lacks knowledge [Hetherington 1998: 456-9]. We are warned not to confuse lacking knowledge with *almost* lacking it, which is what happens when we link the actual and the counterfactual too closely.
2) Fallible Knowledge: 'One knows that *p* even when one might not have done so – indeed, even when might easily not have done so. For short: one knows luckily that *p*. Equivalently: one knows that *p* even while almost not doing so' [Hetherington 1998: 463).

Given that there clearly is a difference between knowing and almost knowing, and given that many, if not most, contemporary epistemologists accept some version of Fallibilism, Hetherington argues that this is sufficient to conclude that:

> Thus although each of our subjects does have knowledge [the subject's of Gettier cases], it would have been easy for any of them not to have done so. All we need to add to our conceptual repertoire for discussing these cases is the idea of an epistemic subject's *not lacking knowledge, yet almost clearly doing so*. […] To assume that a counterfactual lack of true belief implies an actual lack of knowledge is to exemplify the epistemic counterfactuals fallacy [Hetherington 1998: 465]. (original emphasis)[12]

With the notions of fallible knowledge and the Epistemic Counterfactuals Fallacy firmly in hand, Hetherington sets out to offer alternative descriptions of classic Gettier cases to show that, despite what most have thought, the Gettiered subject possesses knowledge.

In connection with a version of the fake-barns case, Hetherington writes:

> As Goldman himself observes (p. 778), his interpretation of the fake barns case – the usual interpretation of the case, it has transpired – relies on a counterfactual claim about Henry. This is the kind of counterfactual in question: If Henry *were* to have been looking at one of the fake barns while driving along, he would unwittingly have been deceived (while having the belief, 'I see a barn', along with seemingly similar evidence). And Henry *might*, so easily, have continued his drive and been misled by a fake barn. So the subjective similarly of his present situation (where he is deceived) makes the actual situation one where he *might as well* be deceived, epistemically speaking. The

[12] In his more recent work on knowing luckily, Hetherington couches his response to the Gettier cases in an epistemology he calls 'Gradualism'; see [Hetherington 2001], especially Chapters 1 and 4; also [Hetherington 2005] and [Hetherington *forthcoming*]. The thrust of the response is to argue that the subjects of Gettier cases have knowledge, though of a rather poor sort. It is knowledge, though it is of a lesser *quality* than the more ordinary knowledge enjoyed in non-Gettier cases.

While Gradualism is an interesting and important view in its own right, I will be evaluating Hetherington's knowing-luckily proposal independently of Gradualism since the theory is so controversial. As can be seen in the passage quoted above, Hetherington thinks that anyone who accepts Fallibilism and the distinction between having knowledge, and having knowledge while almost lacking it, should grant that justified true belief is sufficient for knowledge, even independently of Gradualism. This version of the Knowing Luckily proposal therefore can appeal to Epistemic Absolutists and Gradualists alike.

> epistemic result is the same in each situation. In each, he lacks knowledge of seeing a barn. The counterfactual lack of it implies the actual lack of it [Hetherington 1998: 454-5].

Hetherington argues that such cases commit the Epistemic Counterfactuals Fallacy. The suggestion is that in Goldman's original presentation of the case, significant details are left open, like if Henry continued to drive on through fake barn country or not. Given that, here are two possible versions of the story that Hetherington considers: '(a) Henry is *never* deceived by any fake barns (perhaps he turns the car around, heading home for a just-remembered social engagement); and (b) Henry *is* deceived by some fake barns as he continues on his way' [Hetherington 1998: 456]. Hetherington reminds us that Goldman's original case leaves this detail unspecified, but speculates in an explanatory spirit that people have assumed the subject is actually deceived, rather than merely *nearly* deceived. The suggestion is that the subject in a fake barn case knows, but almost (clearly) lacks knowledge. He knows luckily.

The diagnosis given of other classic Gettier cases has the same structure: for example, in Harman's political assassination case [1973], Hetherington claims that Jill *almost* lacks knowledge, though has it nevertheless; similarly, in Feldman's existential generalization case [1974], Smith knows that someone in his office owns a Ford, though he could have very easily lacked this knowledge [Hetherington 1998: 458-460].

3. Evaluation of the Knowing Luckily Proposal

It is surely true that what Hetherington dubs the 'Epistemic Counterfactuals Fallacy' is indeed a fallacy. In general, Hetherington is correct that a counterfactual lack of knowledge need not entail an actual lack of knowledge. Any acceptable theory of

knowledge must allow for that fact. Hetherington is also right to insist that we should not confuse lacking knowledge with *almost* lacking it. Here are two examples where the subjects seem to know, even though they almost lacked the knowledge they actually have (and to think otherwise would be to commit the Epistemic Counterfactuals Fallacy):

TIME: Jack knows what time it is by looking at his highly reliable watch, even though he was just nearly struck dead by a passing motorist. He very nearly was killed; had he been killed, he would not now know the time. Therefore, while Jack does actually know what time it is, he has this knowledge very luckily indeed. Such luck, however, is compatible with knowledge.

MEETING: Jill knows that the meeting is at 5pm tonight in the Great Hall by reading a posted sign that she just luckily happens to pass. If she had not taken the path she did, she would not have seen the sign, and so would not have known about the meeting. So in a sense, it is pure luck that she believed as she did. Such luck, however, is compatible with knowledge.

Again, any acceptable theory of knowledge must allow for such cases. These are also instances of fallible knowledge in Hetherington's sense: the subjects know what they do, even though they might so easily have lacked that knowledge. Where Hetherington goes wrong, I submit, is inferring from the fact that there can be lucky knowledge, like in the cases above, that there is knowledge in Gettier cases, since they too contain luck.

For those who want to defend the platitude that knowledge excludes luck, therefore, given that there are clear cases of lucky knowledge, they need to make clear that what Gettier cases show is not that *any* and *all* kinds and quantities of luck are incompatible with knowledge, but rather, that knowledge excludes *too much* of certain *kinds* of luck. The issue is not that *any* counterfactual lack of knowledge in close worlds implies an actual lack of knowledge, but that only *certain kinds* of counterfactual lacks imply that the subject fails to actually know. So even those who accept Gettier cases as

genuine counterexamples to the tripartite theory of knowledge can agree with Hetherington's distinction between 'not lacking knowledge, and yet almost clearly doing so.' Despite what Hetherington suggests, the issue does not seem to concern Infallibilism v. Fallibilism: it is not that if one knows that *p* that it is *impossible* that one could have believed falsely; rather the suggestion is that if one knows that *p*, it is impossible that one could have *easily* believed falsely, where this is understood in terms of too much of a particular kind of luck.

At this point it is helpful to distinguish between different kinds of luck. Duncan Pritchard, following Peter Unger, distinguishes between kinds of luck that are compatible with knowledge, and those that are not.[13] The harmless kind of luck that is present in my cases TIME and MEETING above can be described as follows:

> *Evidential Epistemic Luck*: It is lucky that the agent acquires the evidence that she has in favour of her belief [Pritchard 2005: 136].

Knowledge is perfectly compatible with the existence of this kind of luck, as we can see from reflecting on the cases I provided above. What is lucky is that the subjects have the evidence they do. Contrast this benign type of luck with the following malignant sort:

> *Veritic Epistemic Luck:* It is a matter of luck that the agent's belief is true [Pritchard 2005: 146].

What this means is while the subject's belief is actually true, in a wide range of nearby possible worlds in which the subject forms the same belief in the same way as in the

[13] See [Unger 1968] for an early analysis of different kinds of luck and their compatibility with knowledge. See also [Pritchard 2005] part II, especially chapters 5 and 6.

actual world, the belief is false (Ibid.).[14] This kind of luck is not present in the TIME and MEETING cases above: while the subjects are lucky to have the evidence they do, there is no luck that what they believe is true, *given* their evidence. That is, given the reliability of Jack's watch, there is no nearby world where he forms the belief about the time by consulting his watch, and that belief is false; similarly, we can suppose that, given the reliability of signs about upcoming meetings, there is no nearby world where Jill consults such a sign and forms a false belief about the time and location of the meeting.

So, unlike evidential luck where the luck enters between the subject and having a certain epistemic ground, so to speak, veritic luck arises between an epistemic ground and the truth: while the belief may be true, it could have very easily been false, even given how it was formed. This epistemically dangerous kind of luck can be seen by considering another classic case that functions as a Gettier case, despite preceding Gettier's own cases by some fifteen years: the case of Russell's stopped clock [Russell 1948]. Suppose a subject looks at what he takes to be a reliable clock, sees that it reads eight o'clock, and so on that basis believes that it is eight in the morning. It is true, let us suppose, that it is eight a.m. Suppose further that the clock is actually *broken*, but that it stopped the night before at exactly eight *p.m.* Here the subject has a justified belief about what time it is, and the belief is true, though we judge that the subject lacks knowledge. Why? Because the belief, while justified, is only luckily true, in *the relevant sense*. Specifically, the case contains too much *veritic* luck. While the subject's belief is true, there are *very* nearby worlds where the subject forms the belief about the time, on the

[14] Again, bracketing for the moment the issue of necessary truths. See footnote 6 above.

basis of the same evidence, namely by reading the clock, but the belief is false. Had the subject glanced at the clock a minute earlier, or a minute later, and believed that it was eight o'clock based on what the clock read, the belief would have been false. With the contrast between evidential and veritic luck now drawn, we can now appreciate how this plays out in Gettier cases.

As we will see, in order to avoid Gettier cases, some condition is needed to rule out the presence of too much knowledge-undermining veritic luck. While the problem of epistemic luck is a difficult one, the solution no doubt requires relativization to the *method* used in forming the belief in question. One such promising anti-luck principle, for example, is the *Safety* principle on knowledge, which has been offered as a diagnosis of why Gettier cases arise. [15] The principle states roughly that a necessary condition of knowing that *p* is that one's belief could not have easily been false while using the same (or very similar) belief forming method. *Safety*, as Duncan Pritchard construes the principle, holds that: 'it is a necessary condition of knowing that *p* that in most nearby possible worlds in which S continues to form her belief about the target proposition in the same way as in the actual world the belief continues to be true' [Pritchard 2007: 281]. Another way of putting this is that a subject's belief is Safe just in case a subject believes that *p because p* is the case and the belief is stable or robust in the sense that in all of the

[15] For convenience and ease of analysis in this section I will tentatively assume that the Safety principle correctly spells out the way in which knowledge excludes veritic luck. There remains an ongoing debate, however, whether Safety as formulated here, is necessary for knowledge. For dissenters, see [Neta and Rohrbaugh 2004]; [Comesana 2005]. For a formulation of Safety that take into account these alleged counterexamples, see [Luper 2006].

Whether or not Safety as stated here exactly captures the sense in which knowledge is an anti-luck notion is immaterial to my overall case, however. All I require is that knowledge excludes too much of certain kinds of luck (namely, veritic luck), and that this is the kind of luck that gives rise to Gettier cases. In order to *solve* the Gettier problem, the anti-luck principle needs to be formulated and shown to be necessary for knowledge. For my purposes, however, it is sufficient to note the kind of luck incompatible with knowledge, and conclude that therefore *some* anti-luck principle will be necessary to avoid Gettier situations.

nearby possible worlds in which the subject would continue to believe that *p*, *p* is true in at least most, or perhaps all, of those worlds.

So turning to another classic Gettier case, one does not know that one sees a barn based on its looking like a barn if the barn is situated in a field of subjectively indistinguishable fake barns. This is because in *very* nearby worlds in which one believes that one sees a barn because one seems to see a barn, that is, using the same method one uses when not in fake barn country, one's belief is false (because one is looking at a fake). Here one's belief does not constitute knowledge, since the belief is true due to the presence of too much veritic luck. So we can see that it is not just *any* counterfactual lack of knowledge that entails that a subject actually lacks that knowledge. What is relevant is *which worlds*, and how *close* they are that make the counterfactual true. That is, how easy was it for the belief to be false, *given the method of its formation*? The answer to this question determines in part if something is a genuine Gettier case. In short, intuitively knowledge is compatible with certain kinds of luck, and incompatible with others.

Next, let us now consider Hetherington's specific treatment of those classic Gettier cases. It is important to consider the scope of his arguments. Is it that *some particular* cases that people have supposed are Gettier cases are not really Gettier cases after all, or is it that there are NO Gettier cases, actual or possible? This latter claim is needed to substantiate the claim that justified true belief is sufficient for knowledge, thus establishing the Knowing Luckily proposal.

Hetherington points out that in the Gettier cases he discusses, some potentially significant details are left open [1998: 461]. For example, in the original fake barn case I introduced above, Hetherington considers some alternative descriptions of the case:

a) Henry is *never* deceived by any fake barns (he turns around), in which case he was almost deceived, almost lacked knowledge, or

b) Henry *is* deceived by fake barns as he continues his journey.

But if significant details are left open, like whether or not Henry continued to drive on through fake barn country, this again raises the question of the scope of Hetherington's criticism. At most, it shows that some cases are underdescribed, so that it is not clear whether it is a Gettier case or not. As Hetherington rightly points out [Ibid.: 467], it is obviously optional how the details of these cases are filled in. Be that as it may, I submit that it is not optional how to interpret a case once the details are sufficiently filled in.

Compare: consider a case where we are asked to judge whether or not John is bachelor. Suppose we know he is male, as well as many other additional details, but still the case is underdescribed overall. Left with such a case, it is of course open to us to fill in the case however we want (married, single, of marriageable age, etc). But once the details are specified one way rather than another, e.g. that he is an unmarried man of marriageable age, then there is no option in how to interpret the case: he is a bachelor! Similarly, though it is true that cases can be (under)described in ways that make it unclear whether or not they are Gettier cases, or perhaps clear that they are not Gettier cases, genuine Gettier cases do abound in which we confidently judge that while justified true belief is present, knowledge is not. The most that Hetherington establishes is that some putative Gettier cases are not clearly Gettier cases because the details are underspecified.

Specifying them so that *they* are not Gettier cases, for example, so that they do not contain veritic luck, does not show that knowledge is justified true belief.

Given that there is a real distinction between knowing as opposed to knowing while almost lacking that knowledge, it is perfectly coherent to allow, as Hetherington suggests, that there are stronger or more stable epistemic positions. To take an obvious case: one's knowledge can be justificationally overdetermined, so to speak, in that it can be based on multiple independent sources, each sufficient for knowing the proposition in question. For example, one may know that *p* on the basis of perception and testimony, as opposed to knowing it solely on the basis of perception. Plausibly the former case is epistemically stronger or more stable, in that if one of the sources of knowledge became defeated, one would still know on the basis of the remaining source. But how weak is too weak to count as knowing in general? Even without having a precise answer to this question at hand, if one is available, it does not follow from there being stronger or weaker epistemic positions that those in Gettier cases are in strong enough epistemic positions to know. In fact, when we reflect on these cases, adequately described, we judge that this is not the case.

4. Conclusion

In summary, Hetherington is correct that not all counterfactual lacks of knowledge imply that one actually lacks it; but some do. A tentative suggestion has been that when one's belief fails to be Safe, it fails to amount to knowledge. Whether or not current formulations of Safety are precisely correct, we can still appreciate that the lesson of the Gettier problem is not that knowledge excludes luck *simpliciter*; rather it is that it

excludes *too much* of certain *kinds* of luck. The suggestion is that it is the presence of too much *veritic* luck that is incompatible with knowledge, and that it is this kind of luck that is operative in Gettier cases. Despite Hetherington's suspicions to the contrary, it is not Infallibilism that generates Gettier cases, it is rather that the belief could have been easily false, given the way it was formed. Hetherington writes, 'The usual interpretation seems to treat knowing as unable to withstand such arbitrary beginning or foundations – so that if *any* luck was needed to reach one's true belief, the belief fails to be knowledge' (original emphasis) [1998: 468]. We can now see that that is false: there are different sorts of benign luck. Therefore, it is not that *any* luck undermines knowledge, but veritic luck does, and this is the sort of luck present in Gettier cases.

An advocate of the Knowing Luckily proposal may complain that I have been relying on our intuitions, or are considered judgements about cases in defending the anti-luck platitude, and that this is somehow question begging, or otherwise illegitimate [Hetherington 1998: 454]. For example, Hetherington suggests that our Gettier intuitions are justified by some counterfactual story, a counterfactual story that he argues is based on a fallacy [Ibid.]. Granting that the 'Epistemic Counterfactuals Fallacy' is indeed fallacious, I think it is a mistake to think of our intuitive judgements as needing to be justified by anything. Our intuitions are not in need of justification, but rather, of *explanation*. As *data*, intuitions are not apt for justification; rather, elucidation comes from explaining them. Compare intuitions as used by philosophers with empirical observations as used by natural scientists: scientists do not *justify* the observations they make. Instead, they aim to explain them, and make predictions based upon them, etc.

Similarly, philosophers ought to aim to explain their intuitions, which is done in part through philosophical analysis.

In arguing for philosophical theses, such as the claim that knowledge excludes certain kinds of luck or that Gettier cases falsify the tripartite analysis of knowledge, in addition to relying on intuitive judgments themselves, one's overall case can be strengthened if they are *explained*, as well as if their implications are drawn out. An area that may prove fruitful in explaining our intuitions about knowledge that may provide a further way to settle the issue is to consider what is of epistemic *value*. If knowledge is of value to us, does the Knowing Luckily proposal account for that? If knowledge is valuable, one might think it is valuable because it is an achievement that one can take credit for; but if one's belief is true through sheer luck as is the case in Gettier situations, then this is no achievement with which one can rightly be credited [e.g. see Riggs 2002].

If such a proposal can be fleshed out in sufficient detail, this may shed light on *why* we judge that knowledge excludes too much veritic luck, and so it deserves further investigation. But the fact that knowledge excludes such luck is independently established by our considered judgements about Gettier cases, adequately described. Whatever else is true of knowledge, it is non-lucky true belief. For a proposition to count as knowledge, we cannot arrive at its truth accidentally or for the wrong reason.[16]

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