Donald Davidson famously argued that because beliefs can only be justified by other beliefs, it is not clear how we can ever be justified in believing what we see. Many contemporary theorists reject this argument by claiming that perceptual content has propositional structure, and thus can form the basis of justification. However, this may be in conflict with the popular view that the content of conscious perception is at least in part non-conceptual. I argue that a higher-order view of consciousness offers a solution to this problem. According to this view, conscious perception involves the representation of oneself's having a statistically reliable first-order perceptual representation. I argue that other forms of higher-order theories such as Rosenthal's higher-order thought view does not allow such solutions. Although some forms of first-order representational theory may be able to explain perceptual justification, they are rejected on empirical grounds based on neuroscience experiments conducted in my laboratory.