From: [Redacted]@oppo.com
Sent: 14 June 2023 15:03
To: [Redacted] (GROW)
Cc: [Redacted] (GROW)
Subject: Re: RE: A question about EU 2022/2380 common charger regulation

Dear [Redacted]

Thank you very much for your reply!

Actually it is crystal clear that USB-PD should not be limited by other charging protocols, we have already understood this interpretation since your last email reply in February.

What I want to convey in this new email is, several NBs have different understandings of ‘full functionality’ and related provisions in Directive (EU) 2022/2380. Recently OPPO has consulted several NBs about the implementation and interpretation of Directive (EU) 2022/2380, we exchanged understanding of ‘full functionality’. Several NBs told us separately that they believe Directive (EU) 2022/2380 would literally allow proprietary charging protocol providing high charging power than that of USB-PD.

So, according to this understanding, several NBs believe that it should be deemed as complying with Directive (EU) 2022/2380 when the radio equipment being charged at higher power using proprietary charging protocol, provided that the radio equipment could also fully support USB-PD.

Then I may anticipate that in the future all devices could get certificates no matter the devices limit USB-PD or not. And it is unfair for manufacturers who have strictly adapted their products according to Directive (EU) 2022/2380.

I am not sure this is a common understanding among all NBs. May I suggest you have a communication with NBs to learn their interpretations? It is crucial that NBs are aligned with your understanding of related provisions.

Thanks again, and wish you a very pleasant summer holiday!

All the best!
Indeed, the interpretation is correct. Maybe I was unclear in my message.

As expressed, the provision makes sure that ‘fast charging’ via USB Power Delivery is not limited by proprietary communication protocol.

Therefore, if a radio equipment supports a certain charging power, it shall support it across all communication protocols that the radio equipment incorporates/uses. This is true up to \( \leq 100\text{W} \) at the moment as it is the maximum supported by USB PD standard cited in the ‘Common Charger’ Directive.

For example, two (2) chargers with same maximum power, let’s say 80W, but with a different communication protocol (one with harmonised solution USB PD and the other with a proprietary solution), cannot provide a different speed of charge which depends on a limitation of the power accepted by the radio equipment for a specific communication protocol. But, indeed, if a device supports 120W, USB PD would currently be limited to 100W.

However, you are probably aware that EN IEC 62680-1-2 has been recently updated and will allow to support up to 240W. In that respect, the Directive will soon be amended to reflect that change. After this update of the legislation, if a device requires more than 240W to charge, the proprietary charging protocol is, only in such case, allowed to go above the USB PD threshold.

I hope this clarifies the situation.

Regards,

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From: [email]@oppo.com>
Sent: Thursday, June 8, 2023 12:00 PM
To: [email]@ec.europa.eu; [email]@oppo.com>
Cc: [email]@ec.europa.eu; [email]@ec.europa.eu>
Subject: Re: RE: A question about EU 2022/2380 common charger regulation

Dear [Name],
Thanks again for your reply in February!

Recently OPPO has consulted several NBs about the implementation and interpretation of Directive (EU) 2022/2380, we exchanged understanding of 'full functionality'. NBs told me separately that they believe Directive (EU) 2022/2380 would literally allow proprietary charging protocol providing high charging power than that of USB-PD, and they believe that it should be deemed as complying with Directive (EU) 2022/2380 when the radio equipment being charged at higher power using proprietary charging protocol, provided that the radio equipment could also fully support EN IEC 62680-1-2:2021.

So, we run into a dilemma. It seems that interpretations of several NBs are inconsistent with what you have expressed in your previous email. As a result we could not make decisions in this crucial time period on how to adapt our products.

May I know your opinion on this issue? If my information in the second paragraph is correct, do you want to take actions to solve this inconsistency?

Very much appreciated for your work!

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All the best!

OPPO Mobile Telecommunications Corp., Ltd.

From:  
Date: 2023-02-07 16:31
To: @oppo.com; @oppo.com
CC: @ec.europa.eu
Subject: RE: A question about EU 2022/2380 common charger regulation

Dear ,

Thank you for your message.

The purpose of the harmonised charging solution is to ensure interoperability between the radio equipment and charging devices (external power supplies) irrespective of their brand.

content/EN/TXT/?uri=uriserv%3AOJ.L.2022.315.01.0030.01.ENG&toc=OJ%3AL%3A2022%3A315%3ATOC) is there to ensure such interoperability:

“[...] 3.2 ensure that any additional charging protocol allows for the full functionality of the USB Power Delivery referred to in point 3.1, irrespective of the charging device used.”

The provision is there to make sure that ‘fast charging’ via USB Power Delivery is not limited by proprietary communication protocol. If the radio equipment is allowed to support a certain charging power, it shall support it across all communication protocols that the radio equipment incorporates/uses. Two (2) chargers with same maximum power but with a different communication protocol (one with harmonised solution USB PD and the other with a proprietary solution) cannot provide a different speed of charge which depends on a limitation of the power accepted by the radio equipment for a specific communication protocol.

As regards to your concern of usage of counterfeit cables and charging devices, by default, they shouldn’t be present on the market. Nonetheless, towards the goal of a ‘common charger’ and to complement the ‘common charging’ solution on radio equipment side, work is ongoing as regards interoperability on the side of the external power supply. The Ecodesign Regulation (2019/1782) covers these external power supplies. The Commission is reviewing this Ecodesign Regulation to, among other things, promote interoperability by introducing corresponding requirements and provide consumers information related to the external power supply.

I hope this answers your question.

Regards,

From: [oppo.com]
Sent: Tuesday, January 31, 2023 6:52 PM
To: [GROW] @ec.europa.eu>
Cc: [ec.europa.eu]; [ec.europa.eu]; [oppo.com]
Subject: A question about EU 2022/2380 common charger regulation

Dear and all:

I am with OPPO Telecommunications. Sorry to bother you asking question with regard to EU 2022/2380 (common charger regulation).

Many colleagues of OPPO are hardly working to adapt products according to EU 2022/2380. But there are some ambiguities in EU 2022/2380 common charger regulation especially in USB-PD related provisions, my colleagues do not know how to do without a clear interpretation of those provisions.
Before the question below, please allow me to explain the state of the art. Taking into account the risk of counterfeit chargers and cables and also the widely adopted fast charging technology for which a safe charging process is of utmost importance, nowadays many devices (including smartphone, tablets) implemented authentication mechanisms on charger and cable just to make sure charger/cable could be fully trusted with regard to safety. As a result of this authentication and negotiation process, devices could be charged at higher power using manufacturers' own charger/cable than when using 3rd party charger/cable. This authentication and subsequent charging process fully comply with EN IEC 62680-1-2:2021 standard.

My question: Is the radio equipment allowed to support higher charging power (e.g. 55W) when using the manufacturer's own USB-PD compliant charger than when using other manufacturer's charger (e.g. 33W)?

Very much appreciated if you can give me a more clearer interpretation and explanation!

All the best!
OPPO Mobile Telecommunications Corp., Ltd.
Budapest, Hungary.

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