

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
October 26, 2015**

**ORDER GRANTING CONFIDENTIAL TREATMENT
UNDER THE SECURITIES EXCHANGE ACT OF 1934**

Alphatec Holdings, Inc.

File No. 000-52024 -- CF# 32195

Alphatec Holdings, Inc. submitted an application under Rule 24b-2 requesting an extension of a previous grant of confidential treatment for information it excluded from Exhibit 10.1 to a Form 10-Q filed November 12, 2013, as modified by the same contract refiled with fewer redactions as Exhibit 10.1 to a Form 10-Q/A filed on October 21, 2015.

Based on representations by Alphatec Holdings, Inc. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibit will not be released to the public for the time period specified:

Exhibit 10.1 to Form 10-Q filed November 12, 2013	through August 30, 2016
Exhibit 10.1 to a Form 10-Q/A filed on October 21, 2015	through August 30, 2016

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Brent J. Fields
Secretary