



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

July 29, 2019

Patrick S. Miles  
Chief Executive Officer  
Alphatec Holdings, Inc.  
5818 El Camino Real  
Carlsbad, California 92008

**Re: Alphatec Holdings, Inc.**  
**Registration Statement on Form S-3**  
**Filed July 16, 2019**  
**File No. 333-232664**

Dear Mr. Miles:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Thomas Jones at 202-551-3602 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Electronics and Machinery

cc: Joshua E. Little, Esq.